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March 2023

Bristol Civic Society response to the 2023 consultation on the Bristol Temple Quarter draft development framework

Summary and main points

We make our comments under 3 headings:

1) Bristol Temple Meads, City Gateway and Friary North. We understand that the planning work for Temple Meads station has been running for several years, and that the major decisions have been made, but the detailed design remains to be decided.

- We have strong concerns about the distance to bus stops and the lack of a simple interchange facility. We suggest a possible solution.
- We are concerned that the current draft Framework would allow developments near the Listed Buildings that would not do justice to their setting.

2) Temple Gate development framework, which has an 'indicative timeframe' of 10-15 years.

- We are concerned that the current draft Framework would allow developments near the Listed Buildings that would not do justice to their setting.

3) St Philips Marsh. We understand that the plans for St Philips Marsh are the least well-defined, that the timeline for it extends over 10-30 years, and that the project team will work on a masterplan in parallel with developing Temple Meads.

- We are already aware of developers making ad hoc plans in the absence of an overall masterplan. Until a Framework is produced, it will be difficult to manage planning in the area. Are there any thoughts on controlling development until the Framework is agreed ?
- We make a number of detailed comments on issues that the Framework should address.

1 Bristol Temple Meads, City Gateway and Friary North

1.1 New development

High quality design and materials will be needed to complement the Brunel and other Listed Buildings.

The design of the multi-storey car park building for the Southern Gateway should be considered carefully as it will be in a prominent position.

1.2 Access and routes to Temple Meads station.

We responded to stakeholder engagement in January 2020, and supported the general approach as follows.

“We support:

- pedestrians being placed at the top of the transport hierarchy*
- the larger public realm area outside the entrance at the top of the ramp (currently the domination of the public realm close to the entrance by taxis, and the associated pollution from idling vehicles, is unacceptable even if they are Euro 6)*
- the large public realm area between the Brunel Mile crossing of Temple Gate and the northern entrance*
- for disabled travellers and other drivers, the new level station access from the planned new permanent car park on the Kwik-Fit site on Bath Road south of the river*
- the decision not to allow a through-route for bus and private motor traffic from Temple Back East to the Friary.*

The configuration of connection points to taxis, buses and private cars is sub-optimal, but probably the best that can be achieved given the physical constraints.”

We do however continue to have strong concerns about the distance to bus stops and the lack of a simple interchange facility. Only terminating buses are likely to use the Friary loop.

One suggestion is to accommodate bus stops at the new Southern ‘Transport hub’, where the many routes passing through Temple Gate might stop – has this been considered ? It should be possible to stop these southbound bus services directly outside the new entrance. With some redesign to the southern approach to the Bath Bridge Roundabout, northbound services could also stop directly opposite this entrance, with passengers accessing the entrance via a crossing. This would significantly enhance the 'hub' potential of this entrance.

We understand that a ‘dispersed access model’ has been decided, given the constraints of the site. This will mean that bus stops will continue to appear a bit distant from the station exits, even in the Friary. It will be a challenge to design an easy way of finding the bus you need as a stranger. The Framework includes wayfinding proposals, but it will be a challenge to make wayfinding simple and intuitive.

Looking at our 2020 comments (which were joint with Bristol Walking Alliance) and reviewing the current consultation document now, we have assessed the degree to which the points have been addressed. We accept that it is not possible to achieve all the objectives.

2020 comments	Comments now
1) The plans for access from the east and south are much vaguer than access from the north and west. Without this, the plan is incomplete. It is not enough to cross-refer to the TQEZ spatial framework.	Section 6.6 City Gateway Masterplan shows designs for all access points, except the east entrance. Section 2.4 explains:“The provision of a new Eastern Entrance was originally conceived as part of the masterplan but is now being progressed by Network Rail on behalf of the CA.”
2) We would expect to see data setting out how people currently travel to and from Temple Meads Station and, in	Section 6.2.8 reports on the results of “Camera data count surveys ... undertaken during weekday peak times

<p>the light of the declared climate emergency, how this will have to change over the next decade. It is not clear that current thinking has allowed for future radical shifts in travel modes.</p>	<p>on 2nd and 3rd April 2019 to better understand onward modes of travel by station users.” As the document says, the proposals “minimise private vehicle use throughout the Temple Quarter, and particularly in the immediate vicinity of the station”. We support this. Section 6.5.5 re the new Southern Gateway allows for future changes in the design of the ‘Transport hub’ as follows: “a new transport hub to access the station from the south of the city, including provision for private cars, pedestrians and cyclists. ... This hub could be designed for future adaptation and flexibility, recognising that Bristol's transport is changing. This could include higher than the minimum electric car charging points and design for autonomous vehicles. Storeys could be deliberately high and non-split-level to allow for potential future conversion for other purposes.”</p>
<p>3) The connection to taxis, buses and private car pick up points is sub-optimal. It follows that adequate signage within the station is critical. There should be commitment to signage that illustrates the local geography, transport connection points and real time information about public transport.</p>	<p>In section 6.5.4 Wayfinding, Figure 82 shows potential locations identified for new map monoliths, direction posts, interchange and bus information points envisaged by the wayfinding framework.</p>
<p>4) We would expect the plans to consider pedestrian routes to and from the station within a wider area than that shown.</p>	<p>Section 2.5.7 shows in Figure 26 the Bristol Central Area Plan pedestrian routes (2015) for the wider area, but the plans do not make use of the information.</p>
<p>5) Consideration should be given to covered walkways from the station to bus stops to shelter pedestrians in inclement weather.</p>	<p>Not addressed. In addition: - will the walkway from the station to the new southern Transport Hub be under cover ? - in the new position for taxis on Station Approach, will the taxi queue be under cover ?</p>
<p>6) Whilst we welcome the decision not to allow a through-route for bus and private motor traffic from Temple Back East to the Friary, the plans should show how this will be designed and managed, and what access is required for the proposed hotel.</p>	<p>The plans do not go into that level of detail. The plans show a private car drop-off point on Temple Back East, and the requirement for servicing access beyond that on to the Friary. The enforcement of the restriction of private cars on to the Friary will need to be robust, perhaps using ANPR cameras. Similarly for private cars coming east along the eastern arm of The Friary, there needs to be effective enforcement to stop them going beyond the roundabout.</p>
<p>7) We would expect to see some specific plans for provision for disabled travellers (primarily those with mobility impairments, but other impairments too)</p>	<p>Section 6.2.20 lists equalities issues to address. Parking in the Southern Gateway will be prioritised for disabled parking, and provide step-free access to the platforms. There will be Blue Badge parking on Station Approach. Section 6.6.9 ‘Diversity and inclusion outcomes’ summarises the relevant elements of the plans.</p>
<p>8) We agree with Bristol Cycling Campaign in strongly preferring segregated pedestrian and cycle routes to</p>	<p>The plans show a segregated cycle route on the Friary. No other new routes are proposed and many routes to</p>

shared routes.	the station are not segregated. We understand that the Council has responsibility for highways, and therefore the TQEZ project does not have control all the access routes to the station.
9) The cycle route from to the new cycle hub at the end of the Friary should be separate from the proposed public realm area leading to the north entrance, but it should also be relatively direct in order to encourage cyclists to use it. The current plans show a dog-leg, which is not very direct.	The plans show a segregated cycle route on the Friary. The route is not on a straight line the Brunel Mile crossing towards the North entrance, but has the benefit of avoiding conflict with the high numbers of pedestrians approaching the north entrance. This seems an acceptable approach.
10) The recent Temple Gate changes have left some sub-optimal stretches of cycle route – specifically the approach to the station for cyclists travelling from York Road and Commercial Road from the point where they reach the Bath Road bridges. Will this be improved in the new plans ?	The Plan does not refer to any improvement (which would not be under the control of the project). We understand that any redevelopments on the west side of Temple Gate will be encouraged to move the building line back a bit, which will help accommodate a cycle route.
11) We would expect the proposals for bus stops on the Friary to be explained in the context of all the routes and bus stops around Temple Meads.	Section 6.2.8 shows the current configuration of bus stops. Section 6.5.3 shows a schematic diagram of onward travel options. The Friary design in section 6.6.3 includes “capacity for eight bus stands with space for a ninth to be considered at the next stage of design”. These are for bus services that include those that currently use the Station Approach. It is unclear whether the bus companies will divert any other bus services via The Friary. We expect that the bus companies will want only terminating buses to use the Friary.
12) We would expect to see more detail on the both the design and management of the drop-off area on Temple Back East. The design needs to show that there is enough space for parking and turning. We are concerned that access to the proposed hotel will result in no physical barrier to stop motor vehicles continuing from Temple Back East to the Friary	The plans show a private car drop-off point on Temple Back East, and the requirement for servicing access beyond that on to the Friary. The enforcement of the restriction of private cars on to the Friary will need to be robust, perhaps using ANPR cameras.
13) The proposals include no private car drop-off access to the ramp and a single drop-off point on Temple Back East. Consideration should be given to providing a car drop-off point for people driving from the south. If people coming from the south use Temple Back East, they will unnecessarily add to congestion on Temple Way. Perhaps a drop-off/pick-up area could be provided at the proposed multi-storey car park on the Kwik-Fit site. Provision for drop-off for people coming from the west or from the east also needs to be considered. The turnaround at the new Temple Campus site is bound to get used for drop-off and pick-up to access the new eastern entrance, but this is not in any plans. There needs to be more information on the design and management of this.	The proposals remain the same in this respect. Re the drop-off loop from Temple Back East, section 6.6.3 says: “The exact size is to be determined, but the concept layout has capacity for 8 parking spaces and 7-9 pick-up/drop-off bays.” Ideally, there would be a drop-off point south of the station, but it is difficult to see where that might be. And there is anyway an argument that the number of drop-off spaces should be constrained to encourage travel to the station by other means.

2 Temple Gate development framework, including Bristol and Exeter Yard

2.1 Building design

High quality designs and materials should be demanded for this important entrance to the city centre.

Section 8.5.3 'Land use framework' proposes residential use for any redeveloped buildings fronting on to Temple Gate. We question whether this is appropriate, given the noise and poor air quality arising from the high traffic flows. In buildings in such a situation, the mitigation tends to be a system where windows do not open, which necessitates mechanical ventilation, with associated energy use.

We understand that if buildings are redeveloped along Temple Gate, developers will be encouraged to set back the building line to help create a wider, more pleasant environment for pedestrians. We support this.

Section 8.5.4 'Urban design objectives'.

Building height and form

New development should be of a height and scale that is appropriate for the area in accordance with Draft Policy UL2 of the Local Plan Review which suggests at least 200 units/ha for the Temple Quarter and St Philip's Marsh.

This site is considered suitable for a range of building heights. This requires further consideration to ensure that height and scale is sensitive to the residential area to the west. It should be noted that building heights will be subject to future detailed design and planning applications. The scale, massing and detailing of buildings will also need to respond to distinctive heritage of the surrounding area

We suggest a change of the last sentence to: "The scale, massing and detailing of buildings needs to be compatible with and not harmful to the distinctive heritage and character of the surrounding area".

Section 8.6.3 'Planning conformity and strategy'

"The BTQEZ Spatial Framework identifies predominantly medium rise (5 to 8 storeys) mixed use and office development parcels, with active ground floor uses, in this location. The Development Framework identifies a range of 5 to 10 storey buildings, with opportunities to enhance the setting of the Brunel Station, in particular the Bristol & Exeter Yard area."

5 to 10 storeys is too high as a blanket standard. The distinctive character and visibility of the Listed Buildings must be preserved.

3 St Philips Marsh

Section 10.3 'Constraints and opportunities summary' shows the size of the challenge. Particularly ... barriers to movement, poor access, large gated sites, poor environment, the issue of relocation of important services, flood defences. It feels overwhelming. The change envisaged is not incremental, it is transformational.

We note in section 10.1:

"Investment and development in the area would need to be coordinated by public and private sector partners, informed by future changes to local planning policy, and based on large-scale infrastructure delivery which requires significant land assembly. The scale and complexity of this area is significantly greater than others in this Development Framework.

To achieve comprehensive regeneration, a much longer process is required. This is expected to require significant public sector investment in infrastructure, and planning policy that will guide phased development."

3.1 Vision

Section 10.5 describes the 'vision' for three neighbourhoods:

1. North West St Philip's Marsh: a knowledge-based, employment-led area
2. South St Philip's Marsh: a sustainable, residential-led mixed-use neighbourhood
3. North East St Philip's Marsh: a mixed residential and employment area, including small-scale manufacturing and makerspaces.

This seems reasonable. In particular, we support the establishment of a leading innovation district in the north-west. The location needs to be identified and protected for employment use, and ideally the new businesses should be cheek by jowl with the new campus. There will be competition between employment use and student accommodation close to the university, and the framework should ensure that student accommodation does not constrain the employment opportunities close to the university building.

We note and support the following from section 10.5.8:

"Provision of enabling infrastructure is likely to require land assembly and public investment to facilitate development. This may shape whether future development would come forward on a managed plot-by-plot basis or as a coordinated phased development. A detailed masterplan and design code with flexible plot parameters could be valuable tools to attract future investors and guide development quality including housing delivered via new and accelerated methods of modern construction."

This is written in the section on South St Philip's Marsh, but may apply more generally across the St Philips Marsh area.

We think the framework should distinguish between student and other residential development. In a housing crisis, development of student space is crowding out other residential development. Whilst the location is quite suitable for student accommodation, existing proposals, if implemented, would take numbers of student beds well towards the 700 suggested for the area in draft policy H7 of the Local Plan. If the area is to develop as a balanced and diverse community it needs to have predominance of conventional residential accommodation of various sizes and tenures.

3.2 Land-use and density

It is clear that the St Philip's Marsh area will need strong planning guidance if it is to achieve the desired goals. We are already aware of developers making ad hoc plans in the absence of an overall masterplan. Until a Framework is produced, it will be difficult to manage planning in the area. Are there any thoughts on controlling development until the Framework is agreed ?

We think that Bristol's planning policy is not giving enough guidance on built form and design to balance the seemingly overriding objective to build as many homes as possible, and we look to a policy document for St Philips Marsh that does this well. We look for a document that has Supplementary Planning Document status, not just a framework endorsed by the Bristol administration.

The three Land-use & Density Testing Scenarios in section 10.6.1 illustrate different extents of change from employment use to residential:

- 1 Employment led mixed-use (2,250 dwellings of which 30% houses, 30% residential)
- 2 Residential led mixed-use (4,500 dwellings of which 15% houses, 60% residential)
- 3 High density residential-led (7,000 dwellings of which 5-10% houses, 85% residential)

The Framework will need to give a clear direction to developers on the degree of change to residential, but who is to say what is 'right' ? It is difficult to project forward the extent of change without the Employment Land Study (due to be published this summer ahead of the Publication Version of the Local Plan). Even when the ELS is published, it will not provide all the answers. Perhaps scenario 1 should be the default until a 'solution' for alternative provision of employment use is demonstrated.

We are concerned that workspace for light industrial uses is being pushed out of the centre of Bristol. This has can have significant social and economic consequences. If this is pushed out beyond the suburbs, it will create transport issues for customers and workers alike.

We note that each of the scenarios proposes about 600 dwellings to be houses, with the variation in total residential numbers coming from apartments. This is no doubt with a view to achieving higher density and maximising numbers of dwellings, but is this number of houses sufficient accommodation for families ?

The density in dwellings per hectare implied by the scenarios is not given, so it is difficult to comment on the proposed numbers of dwellings. **The Framework is unspecific on building heights in the areas designated as higher density: we would not want to see the Avon Street canyon approach spread to St Philips Marsh. The Framework will need to be more specific on density and height.**

In 10.6.1 'Land-use & Density Testing' on page 299, a 'Mixed-use Perimeter Block' design is shown. This follows an illustration of alternative plot designs on the previous page. In principle we support the 'perimeter block' design as a way of achieving higher density, as it limits the height of the buildings whilst providing communal open space.

We have been told that trains in the GWR maintenance siding are sometimes left running for days, including revving engines. This may be a noise issue for any nearby residential development, and this may influence land use allocation.

3.3 Movement and access

The railway in particular will remain a major barrier to movement, reducing north/south permeability to two roads and the riverside path, and access from the east to two roads. The vision for North East St Philip's Marsh recognises this: "*The street pattern could also reflect much longer term ambitions to improve connectivity southwards in the event that the St Philip's rail depot should ever be considered for redevelopment.*"

We support in particular the aim in 10.6.2 of:

- *A permeable grid of quiet streets and spaces which allows a choice of routes for pedestrians and cyclists whilst filtering vehicle access*

We support the provision of additional pedestrian bridges across the river and the Feeder as shown in Figure 179f.

The St Philips Marsh area has been described as a 'lobster pot' for travel to and from outside the area - difficult to access but even harder to get out. The Framework must consider the following:

- the workforce currently tends to come by car not public transport. **We look forward to more information on bus routes through the area and what destinations would be served.**

Presumably the bus operators will be involved in developing the Framework?

- as noted in 10.3.1 'Constraints', some uses in the area form part of the distribution network for delivering goods and services within central Bristol, and access will remain important for those that stay.

There is no Residents' Parking Scheme in the area, so it is vulnerable to commuter parking.

3.4 Community Infrastructure

Section 10.6.3 shows possible locations for neighbourhood centres, healthcare facilities, primary schools. We look forward to more detail on the rationale of the suggested locations and how appropriate services including retail would be encouraged.

3.5 Access to green space

In introductory sections to the TQDF, section 2.5.9 'Public realm and green infrastructure' says "Only approximately 2% of the Development Framework area is currently designated for open space", and provides a good analysis of the need for more open space, and better and more accessible open space, in St Philips Marsh.

The 2008 Parks and Open Spaces Strategy set a minimum quantity standard of 27.8 square metres per capita, of which the 'Locality component' – the minimum amount of green space that any area should have, before adding the 'City wide component' of Destination parks – is 18.0 square metres per capita. The Urban living SPD refers refers to space for children, using a measure of 10sqm per child, based on the number of children expected in the development.

Section 10.2.1 'St Philip's Marsh and Environs today' shows the size of the challenge for open and green space

"Sparke Evans Park and the River Avon and Feeder Canal corridors are significant green infrastructure and ecological assets and key aspects of the character and identity of the area. By contrast the interior of the area has few trees and areas of low level planting. The riverside greenway path is largely unlit at night and lacks overlooking and natural surveillance from frontage buildings. For many it would be considered a 'no go environment' on the grounds of personal safety concerns. Outside of typical working hours the area is distinctly uninviting and does not generate significant footfall, cycle and vehicular movement. The area lacks bus services. ..."

We note section 10.6.4 'Public Realm and the Built Environment', which lists possible key open spaces. The list relies on the riverside, Sparke Evans Park and Netham Park as the only large open spaces. All these large spaces are on the periphery of the area; other spaces are needed more centrally.

Given the development pressures, we think that providing adequate accessible open space will be a challenge. The framework suggests in 10.6.4 'Public Realm and the Built Environment' pocket open spaces, neighbourhood squares, and green streets; as the framework is developed it will need to develop a spatial framework for how this might be achieved. The framework should require developers to create green space within their developments. And the framework should clarify whether sufficient green space can be provided through developer requirements, or whether the public sector will need to step in ?

In 10.6.1 'Land-use & Density Testing' on page 299, a 'perimeter block' design is shown, and the provision of green space in such a design is shown on page 318, which is visualised on page 319: this provides communal space within the rectangle of perimeter blocks, whilst building at higher density. This seems an acceptable approach at the development plot level, but an area plan is needed as well.

The Framework should address the mix of new green space:

- as much as possible should be open rather than privatized space. (The disadvantage of perimeter blocks is that there may be a temptation to keep the open space private.)
- a mix of sports uses, play, quiet places for rest, places for growing or wilding
- public parks, funded by developer contributions, including future maintenance costs

In section 10.2.1, it is noted that "Proximity of industrial buildings to the river edge creates a poor waterside experience and limits opportunities for an integrated landscape response to flooding and riverside habitats." 10.6.2 'Movement and access' envisages a 'River Avon Greenway' that is 15-25m wide, which is visualised on page 317. This looks very attractive, and we support it. Whether it is achievable depends on whether it is feasible to expect redevelopments of the riverside plots not to build on some of the land which is currently built on. Looking at the map, in places there is not much space between the riverside and Albert Road.