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## **The Society's response to the Bristol Temple Quarter Enterprise Zone Spatial Framework Consultation 2016**

April 2016

### **1 Introduction**

The Society supports the purpose and form of the Framework. A living document is the correct choice of policy advice document. A masterplan would be immediately out of date.

The Society also supports the Mobility Plan (SUMP) and Public Realm Guide (Part 1), and in particular the layers approach of the Framework, the Hardware/Software/Mindware approach of the Mobility Plan, and the Place Print tool of the Public Realm Guide. The Society will use the Place Print tool when responding to individual development proposals.

### **2 Realising the ambition**

#### **2.1 Getting development started**

Economic factors will determine both the location and sequence of future development. The Society applauds the council's proactive approach of buying up sites to influence development (Appendix B).

For various reasons beyond the Council's control, development in the Enterprise Zone has been modest. The Society suggests that the Enterprise Zone Board should actively seek a high profile partner who could act as an incentive to stimulate and attract future employers. The Society suggests that a University science or technology Department could be a suitable employer who might spark interest to develop an employment 'cluster'. The success of the Engine Shed development hub is the obvious precedent. The Society understands that Universities have charitable status and are exempt from business rates. The sacrifice of business rates for one development site could be justified by the benefit of an acceleration of investment and employment interest.

#### **2.2 More detailed guidance**

The documents are useful as an aspirational overview for all stakeholders, but it is perhaps questionable how useful they will be for developers, both commercial and the key public agencies. As a document to foster and direct investment, developers may want guidance that is shorter, more specific and detailed, and less discursive and exploratory. The icons

used in the Place Plans (Spatial Framework 55-70) are specific examples where developers will want more detail to take the proposals beyond aspirations.

To further influence future development at a more detailed level following the publication of the Framework, the Society suggests that the Council should proceed to invest design resources in Project Briefs for those areas that have the greatest expectation of attracting developer investment in the next five years. Such briefs can guide the design process to enable the formation of balanced planning decisions.

Developers will want simple and clear information on what is available by way of advice and shared database resources. The information is in the documents - thematic contextual studies (p11 of the Framework), partners involved and available sources of advice (p98 of the Framework), data gathered (p51 of the Public Realm Guide) – but could be made more prominent and put in one place.

The Mobility Plan usefully distinguishes between funded projects and 'aspirations', and shows the sources of funding. It would be useful if the Framework's list of projects planned for 2016-20 (p96) did the same, to give confidence to developers that they will be delivered. Or at least make clear the determination process for the selection of projects suitable for public investment.

### **2.3 Supporting the process**

The documents, taken together, propose a sequence of procedural stages both before and after development (Spatial Framework pp99/100, Public Realm Guide pp48-51, and Mobility Plan p52). One wonders whether this is fully supportable, constrained by shrinking public resources and the practical impact on time, project cost, manpower.

### **3 Policy**

The WoE LEP's Economic Strategy should be added to the list of existing policy documents, and the relevant content for the Zone should be highlighted.

### **4 Buildings**

#### **4.1 Block layout, building height, land use,**

The Society supports the block layout and land use, which will be subject to revision as a consequence of commercial proposals and individual planning decisions.

The Society does not support the proposals for tall buildings that are indicated in Figure 3 that shows 'Development Form' of the Enterprise Zone. The 3-D plans are useful, but fail to create the impact of tall buildings at ground level. The Framework emphasises the need to create a sense of place, which the 'fly through' cannot achieve.

Building heights should respond to the predominant existing context of the surrounding development and urban design considerations. The historic built form throughout the majority of the Zone is low rise, which would be inappropriate for the Board's development aspirations. Other solutions to providing the same level of floorspace should be exhausted before inviting tall buildings.

The development form should be a mix of low rise and medium rise; the differences of scale would produce the required mix of heights to give the Zone a sense of place. The Zone is not an appropriate location for tall buildings. When a tall building is permitted it becomes difficult for a planning authority to resist further planning applications for tall buildings. A cluster of tall buildings quickly overbears the surrounding built environment, any sense of place or local character becomes diluted. The indication of a tall building, a hotel, on Plot 3 forcibly makes the Society point. Historic England and the Council did not support the developer's tall building proposal because of its impact on the Grade I listed Temple Meads Station. Similar objections will probably affect other sites. The Council should amend the 'Development Form' guidance to omit indicating opportunities for a tall building.

#### **4.2 Temple Meads Gateway**

The Framework includes the Temple Meads Gateway plots (TM01 to TM06) in the planned development list for 2016-20 (p96), except for the elements that are dependent on the station redevelopment, which will not start till 2020+. These plots are the most attractive to property investors in the short/medium term, because:

- The Council plans a substantial investment of public funds to improve Temple Gate and Cattle Market Road and the associated greenway.
- Network Rail plans to redevelop Temple Meads Station. T
- The Temple Gate realignment will release former highway land for development on site TM02A/B and lift the development blight from the George and Railway/Grosvenor Hotel island site. There is market interest in developing this area.
- The 'Meanwhile' success of the Engine Shed generated its expansion into the Boxworks, on site TM01B.
- The Council has received development enquiries to build offices on the former WH Smith warehouse site TM04A between the Station Approach and Cattlemarket Road.
- The Bristol Arena project and a hotel proposal on Plot 3, immediately adjoin the area.
- There is an extant planning permission to redevelop site TM04B on Cattle Market Road.

The quality of new development on the WH Smith warehouse site TM04A and on the sites TM01A/B and TM02A/B must achieve the design standard set by Policy BCS21 and the Framework's design aspirations. These buildings must complement the important listed buildings that will be their neighbours. The new buildings will frame a gateway to the city. It is critical to consider how the future buildings will address the highways and their coordination to ensure that there is no 'no-man's' land left over after redevelopment. There should be a tighter urban grain, which would support the aspiration to reduce the highway content if there is a future reduction in traffic. The Society suggests that the Council should produce an **area project brief with a first stage for the sites TM01A/B and TM02A/B.**

Within the medium term it is probable that the block on the west side of Temple Gate between Temple Gate House and Victoria House will be redeveloped. The Society suggests that a project brief could be delayed in respect of the sites TM05A/B/C until Network Rail publishes its redevelopment proposals. A project brief could then consider the TM05 sites within the context of any changes to the Station Approach.

### 4.3 TM02A/B

The Society was disappointed to see that the Temple Gate development proposal at TM02A shows a large building with a new large public space. 'Headquarters' capacity buildings would dominate the area and overbear the human scale of the Brunel Mile and conflict with the local place making objective. This site could support a development with a larger footprint of buildings that would not be taller than the Grosvenor Hotel with pedestrian-only access between the new buildings.

The site is small enough to service from the perimeter. An alternative to a large public space would be 'pocket parks' in spaces between the new buildings adjacent to the pedestrian routes. A close grain area of work and recreation would create a sense of place and would attract pedestrians along the Brunel Mile, past the proposed 'close' of St. Mary's Redcliff, to Queen's Square and further into the city. This is an opportunity to build on the success that the 'meanwhile' use of the Engine Shed and Boxworks. Smaller buildings are more flexible than large concrete frame buildings. The Society reminds the Council that the Bristol Urban Design Forum made a similar response to the New Temple Gate Consultation in 2015, which the Society supported.

The Society supports the retention of at least the street facades of the George and Railway Hotel and of the Grosvenor Hotel, which are critical to the retention of a sense of local identity.

### 4.4 Plot 3 (TQ01) and Plot 6 (TM01C)

The Society accepts that, in the absence of Network Rail's specific proposals to redevelop Temple Meads Station, it is unrealistic to expect the Council to publish a project brief with an all-inclusive vision of Plots 3 and 6.

### 4.5 Cattle Market Square and the Totterdown Basin

The sites TM06A-E present a greater challenge. This is the area where the Society suggests it would be profitable for the Council to produce **a second project brief**. The regeneration of the Totterdown Lock is the critical element in the redevelopment strategy of the Silverthorne Lane area and it may require the investment of public money.

The Birmingham canals have been at the heart of the regeneration of the city centre. The regeneration of the Totterdown Lock would link the Harbourside Walk, and the Avon Walkway at its junction with Brock's Bridge to Arena Island. The regeneration of Totterdown Lock would transform the development opportunities for the sites surrounding the proposed Cattle Market Square and the



A Birmingham canalside.

surviving Cattle Market heritage buildings. It is also reasonable to assume that the attractively regeneration of Totterdown Lock will invite further development on the other side of the canal, which could be further considered in the next iteration of the Framework.

## **5 Public space**

### **5.1 General approach**

The Society welcomes the high importance given to quality public realm, the genuine priority given to pedestrian and cycle movement, the quayside walkways, and the approach to linking the various elements. The success of the project in terms of place-making will depend on creating high quality, interesting and well-connected spaces. This is all in the Framework documents but when briefs are prepared for individual development opportunities, they must include a strong lead on public space-making, particularly street-level activities, materials and linkages.

### **5.2 Greening**

5.2.1 The Green Infrastructure Plan (Appendix E and p40), shows all the greening, both existing and proposed, concentrated alongside the waterways; there is very little greening elsewhere. The Public Realm Guide has the necessary references to greening; it is important to ensure that greening is incorporated into the new public spaces.

5.2.2 There are few street trees. The large and flourishing collection of about 60 trees planted around Temple Circus, probably about 20 years ago, which will be felled must be replaced. Doubling the tree cover is one of Framework's stated principles. Street trees are mentioned. The Framework should specify where more trees should be planted.

5.2.3 The Zone will have a high density development of employment space. The Society is concerned at the lack of new public green spaces. The nearest public open space would be Castle Park, Temple Gardens or Sparke Evans Park. Public green oases, even mini parks, are desirable.

5.2.4 The proposed improvement of Sparke Evans Park will contribute little to the neighbouring Zone. Even after Paintworks 2 is complete, the Park will have only a small neighbouring residential population and access is difficult.

### **5.3 Active floor frontages**

There are large amounts of active floor frontages on the Place Plan maps (pages 56, 60, 63, 68). This objective is critical to bringing public spaces alive, but the Society wonders how much the Council can deliver.

### **5.4 Plot 3**

Plot 3 is allocated for a hotel next to the river, and behind it a multi-storey car park. Motor traffic for both buildings will have access via Temple Back East and Isambard Walk. The

proposed uses appear to conflict with the hierarchy of public spaces in the Public Realm Guide, which show Isambard Walk as an exceptional space.

## **6 Access and mobility**

### **6.1 Pedestrian/cycling access from the North**

National and local planning policy places walking and cycling at the top of the urban movement hierarchy. The Framework must give a stronger lead to links that join the Zone to the city centre. The Temple Gate pedestrian route (p42) needs to be interesting and comfortable to walk along. It is important that the pedestrian/cycling route to the centre of the city along Victoria Street should be clearly marked and attractive and human in scale, and new buildings must be informed by this overriding requirement.

To reconnect Temple Meads to the centre of the city the quayside walkway starting from Isambard Walk along to Counterslip and beyond must have improved signage. The Society suggests that a form of colour trail in the pavement is required.

### **6.2 Pedestrian access from the West:**

The new wide single-pass pedestrian crossing at the end of Brunel Mile is a very welcome. The same priority for pedestrians and cyclists must be applied the crossing points further south along Temple Gate and Bath Road. These crossings should address the following unresolved issues:

- The proposed walking route to/from buses on Redcliffe Hill that maintains the awkward two-pass dog-leg crossing from the bottom of Station Approach.
- The Cattle Market Road/Clarence Road axis requires an improved crossing of Bath Road for pedestrians and cyclists.
- The crossing across Bath Road south of the river would maintain the awkward two-legs.

### **6.3 Pedestrian/cycling access from the South**

The Society supports the "Bath Promenade" (p42) parallel to Bath Road to improve the poor pedestrian/cyclist provision along Bath Road, but notes the delivery problems. The funding cost of new bridges over the river and railway is conditional upon the outcome of a feasibility study.

The attraction of the Bath Promenade for pedestrians and cyclists is that it is on a desire line, and is set away from the road. However, the Society suggests that the Council should consider alternatives particularly if the feasibility study fails to support the proposal.

- There is scope for a pedestrian route which avoids motor traffic - via Totterdown Reserve through the Arena site, to access both Temple Meads, and along the quayside walk towards Castle Park, the old city and Broadmead/Cabot Circus.
- A pedestrian bridge across the river east of the railway from the Arena site could produce a better cost/benefit. It would be on the desire line from the Bath Road via the proposed new ramp down to the Arena site, and onwards to the proposed new entrance to Temple Meads on Cattle Market Road. And it would reduce the pedestrian traffic over Brock's Bridge before and after Arena events. To complete the route along the

desire line, the design of the building layout in the Cattle Market/sorting office site would need to be changed from that indicated in the Framework.

#### **6.4 Cyclist access to the new station entrance (Brunel Square)**

Cycling policy dictates a significant quantity of cycle parking in the new multi-storey car park on Plot 3, which will take cyclists through the busy public space in front of the new station entrance. There is no evidence to show how cyclists would approach the new station entrance from Brunel Mile. Either cyclists should be guided along a route away from the entrance, or cycle parking should be placed closer to the approach from Brunel Mile.

#### **6.5 Signage**

More emphasis must be given to the provision of "wayfinding and information infrastructure" (p19) to support the interchange. The Society suggests that the development of the north west entrance to Paddington Station is an example of clear high quality waymarking at a dispersed interchange. The taxi rank will be on the Station Approach and bus stops will be dispersed between the Friary, Temple Gate and as far away as Redcliffe Hill and Old Market. A form of colour trail in the pavement is required.

#### **6.6 Pedestrian and cycle routes – presentation in the Mobility Plan and the Place Plans**

The priority given to pedestrian and cycle movement is welcome. But there is an inconsistency of presentation between the diagrams of the Framework and the Mobility Plan. The Framework shows the cycle routes layer on page 47 but then excludes cycle routes from the Place Plans (pages 53f). The Mobility Plan (p16/17 and 31) shows the cycle routes, but not the pedestrian routes. It is important that the Place Plans consider cyclists, and that the Mobility Plan should consider pedestrians.

### **7 Silverthorne Lane area**

#### **7.1 Introduction:**

The Society recognises and values the considerable prior effort put into the Heritage Assessment for TQEZ and that Silverthorne Lane is potentially one of the 'jewels in the crown' of the TQEZ if sympathetically redeveloped as a commercial activity centre.

#### **7.2 Realising the ambition**

Silverthorne Lane is cut off by barriers – the railway, Floating Harbour and Feeder Canal. Critical to development of the Silverthorne Road area is improving access to it.

The Society recommends that bridges need to be built in advance of commercial development, to open up opportunities in the Silverthorne area in the same way as HCA funding enabled Brock's Bridge in advance of the Arena development. Obtaining a reliable funding stream is key to this: past experience shows that developer-funded s106 bridges tend to get built late, and bridges funded by government funding programmes (eg Cycling Ambition Fund) tend to founder on tight programme deadlines.

The most important new bridge for improving connectivity is Silverthorne Bridge. It will be enhanced by the new areas of public realm at the Square on the Cattle Market site and Avon Street Market Place (marked 3 and 7 in fig 5 on page 41 of the Framework).

### **7.3 Buildings**

At present most of the land has low density employment use. The plan is for continued mostly employment use along the peninsula between Silverthorne Lane and the Feeder Canal, with mostly housing at the west end. The Society observes the recent housing enquiry at the east end, contrary to policy.

The Society recognises there are physical constraints to the actual redevelopment in any long cul-de-sac, which may need to be sequenced. A strategic show-stopper may be whether the emergency services can attend a building fire in Silverthorne Lane during an Arena event access period.

### **7.4 Access and mobility**

#### **7.4.1 Connectivity on foot or bike**

Improving connectivity for those on foot or bike is particularly important because:

- as the area becomes more densely populated, the scope for access for travel to work by car will reduce
- the Framework offers no improvements to public transport in the Silverthorne district
- there is no plan to make the east end of Silverthorne any more than a long cul-de-sac
- walking times to the area are longer than they might be because of the circuitous routes around the barriers that surround Silverthorne Lane

#### **7.4.2 Safety for pedestrians**

The current under-railway accesses are Dickensian or worse. They are currently a disincentive to walking to the Silverthorne Lane area, particularly for women and particularly after dark. The document does not explain how these would be improved.

#### **7.4.3 Bridges**

The most important new bridge for improving connectivity is Silverthorne Bridge (marked A in fig 7 on page 45 of the Framework).

Another possible bridge to improve connectivity from the south (Paintworks, Bath Road or Totterdown) would be across the Feeder Canal to the west of Albert Crescent/Short Street. This is arguably more important than enhancing the existing St Vincents Bridge (marked E in fig 7 on page 45 of the Framework), which has lost its Victorian relevance to the greater St Phillips road network due to post-war street closures.