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The redevelopment of the Lloyds Bank, the Bank of England, and the Norwich Union Buildings site at the west end of Castle Park.

April 2021

Support for the scheme

We are grateful to MEPC (the developer) and the development team for giving us several excellent presentations and the discussion about the proposed development.

The Society strongly supports the redevelopment of this long-blighted area of out-dated and underused buildings and restored access to areas without current public access and supports the policy compliant proposed mix of uses. The scheme offers several significant planning gains.

- The reinstatement of St Mary-le-Port Street and Adam and Eve Lane would realise the vision of the 2015 Central Area Plan (CAP) to reduce barriers to pedestrian movement between Broadmead, Cabot Circus and Old City) and create a desire line to connect St. Nicholas Market, through to Union Street.
- Making St. Mary le Port Street and the church ruins the centre of the development would conserve the church ruins and create a new public space that integrates new planting, and which insulates pedestrians from the surrounding traffic to create an intimate civic space. This aspect of the scheme brings forward the CAP aspiration to continue the retail function of St. Nicholas' Market towards Bristol Shopping Quarter.
- Although the scheme does not reduce the width of High Street or Wine Street, it preserves the mature street trees which will please many and strengthens the western edge of the Park that is poorly defined, currently.

- The proposed line of the development in Wine Street conserves the mature trees, an important consideration for many respondents and keeps the current ‘boulevard’ character of the street.
- The scheme leaves the fourth quarter undeveloped apart from the creation of a new landscape. The developer proposes an enhancement of the south-western entrance to Castle Park rationalising the currently awkward changes of level to create a new landscape to improve the space and encourage accessibility and activity. The redeveloped parkland enhances the park and the quayside walkway and would open a view of the church from the east.
- The careful design of the pavement level units where human interaction with the development will be greatest. These attractive shop units would enhance the character that St. Nicholas Market gives to the area with its emphasis on supplying a milieu suitable for small and independent businesses.
- The conservation of the medieval vaults and the provision of public access to them is very much welcomed, subject to detailed proposals.
- Car parking is reduced to a minimum which complies with the policy to reduce private car use in the centre of the city.

This response makes several suggestions for the improvement of the scheme, but these should not be seen as reducing the Society’s overall support for the broad principles underpinning the proposed redevelopment.

Building heights: planning policy and planning advice

The Central Area Plan (CAP) had an exceptionally long period of gestation with a high degree of public involvement. The planning guidance for the west end of Castle Park has long been in the public domain. The Society supported the CAP. In our view the Council should support the published planning policy for the redevelopment of this site.

The City Centre Framework (June 2020) (the Framework), which is familiar to all, states in Aim 18 - Promoting appropriate building height:

“The Framework proposes a height range of 4-6 storeys for buildings that enclose streets, creating human scale ‘base buildings’, with opportunities to increase heights within larger blocks, (this repeats CAP planning policy). Greater building height could be considered where it would not be harmful to local character and distinctiveness and in particular the setting of valued historic buildings. The majority of under-developed sites within the city centre can accommodate new buildings of the established city scale; however, there are a number of sites alongside major road corridors or on the edges of Castle Park where an increase in building heights can be considered.”

This policy advice is a material consideration. The Society is concerned about the height of all three buildings but particularly Building B. It will be important for the applicant to provide evidence to justify the proposed building heights and to illustrate their visual impact on both near and more distant views. Once this additional information is available the Society will be in a position to make a more considered assessment of the building heights and their suitability, or otherwise. We have the following detailed comments:

Building A

The design of Building A divides opinion. The majority are attracted by the proposed elevational treatment and by the references to historic structures on the site. However, the height still needs to be justified particularly in views along neighbouring routes in the central area.

Building B

The Society supports the height of the lower part of this building. The Society is still concerned about the building's total height. We appreciate that the upper three floors are offset to allow views of the towers and spires of city centre churches. However, despite the recent modifications, the height of this set-back extension creates an awkward conjunction with the main block. Furthermore, the upper floors would diminish the impact of the spire of St. Nicholas Church, a key view from Bristol Bridge. Building C will create the gateway to High Street. We suggest the reduction of the three-floor extension. We would support a rooftop plant enclosure if the design enhanced the view from Bristol Bridge.

Building C

There is sensitivity among members about the height of the upper section of floors of this building. The scheme must give a satisfactory explanation to justify the height of a nine-floor building which exceeds Wine Street building heights and the height range of 4-6 storeys that the Framework at Aim 18 – 'Promoting appropriate building height' - proposes. The scheme must also show how the height responds appropriately to the local context particularly when viewed from within the Park. We assume that the open area of the Park is unlikely to be reduced by further development. Building C would create a cliff of masonry to face the Park. The Framework at Aim 20 States that development should build: *"A strong relationship with Castle Park, including a properly designed transition between the redeveloped area and the park....."*

Design and materials

The Society supports the development of three buildings in different architectural styles. We broadly support the elevational designs but cannot comment any further until we have seen the justified views of the development. There was concern about the views looking east along Corn Street and south along Broad Street.

One potential issue which has been identified by members is that seagulls and other birds may be attracted to nest and gather on the rooftops and terraces at the upper levels. Measures to combat this problem in later years could have a negative impact on the appearance of the buildings.

The public realm - High Street and Wine Street

We assume that developer will plan the areas under the trees, which currently have a gloomy, 'left-over' space with little public use. The development site occupies the east side of High Street and much of the south side of Wine Street. With as much force as it is able, the Society invites MEPC and the Council to consult to plan the improvement of these streets. Any section 106 contribution should be allocated to this purpose. The construction of the new buildings will create a sense of enclosure in High Street and Wine Street that they currently lack. The concave façade of Building A could make a major contribution to creating a square at the junction of Corn Street, Broad Street, Wine Street and High Street. This civically important site is disfigured by a swept bend that divides the carriageway. The traffic engineering is not just visually offensive, it has no place in a city whose policy is to put pedestrians at the top of its movement strategy. This is an opportunity to create a proper urban square at the cross-roads and remove the swept curve. Installation of artwork to memorialise the former Bristol Cross should be postponed until the quality of a new square can be assessed.

Alternative views of the proposals

It comes as no surprise that members of the Bristol Civic Society hold a wide range of different views regarding this development.

There is a view held by some that development should recreate the medieval street pattern. Whilst the proposed development does this to some extent, some argue that the development leaves too much expanse of open urban space and that the development should build to the original line of High Street and Wine Street, or at least build to the back of the current pavement. This would have the effect of enclosing the open area formed by the junction of Corn Street, Broad Street, Wine Street and High Street

Referring to planning policy on this issue:

- the Central Area Plan's policy BCAP37 is silent on whether this approach should be adopted or not
- however, the City Centre Framework clarifies that the BCAP's 'Restored City' approach should be applied, which includes the restoration of building lines:
"Aim 20: Design Approach: Restore 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. For example, a restore approach at St

Mary le Port will involve development of the existing site, re-instating former street patterns and the construction of new buildings which may exceed the height of those currently on the site (see Bristol Central Local Plan Policy BCAP37 KS04).

This approach would mean taking current highway land, relocating underground services, and retaining enough space for bus movements. It would also mean the loss of additional trees. However, it might also facilitate some reduction in proposed heights without an overall loss of floorspace. Some think this approach has merits, and that the difficulties of the approach are not insurmountable, and it should be given some consideration.

Questions have been raised over the future demand for office floorspace in central Bristol coupled with a preference to see a largely residential development. Again, we note the current proposals comply with adopted planning policy.