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## Comments on the draft Whitehouse Street regeneration framework

August 2022

We write with our comments on the framework, as presented on display boards at a drop-in event in July, prior to full public consultation in the autumn.

There is much with which we agree in the in the place-making objectives expressed in the draft framework, but our support is tempered by a concern that any framework voices feel-good principles and objectives that are not necessarily borne out in reality. On balance, we think that the employment objective should be strengthened.

In contrast to the adjacent areas of Bedminster Green and Mead Street, it helps that the three major landowners have allowed sufficient time before coming up with proposals for developing their sites, and that the framework will be finalized before the planning applications come in. The community involvement seems to have been extensive, with leadership by Action Greater Bedminster.

Our specific comments are:

### 1) Place-making and character

We support the intention to create a “15 minute neighbourhood” but that needs to be carried through in the framework, particularly with regard to providing local employment opportunities and public services.

There are references to a distinct character, but it is left somewhat vague as to what that character is intended to be.

There is a lack of emphasis on high quality design and use of quality materials

Surprisingly we can find little reference to heritage in the display boards. We assume this will be rectified in the full framework document, referring to the character appraisal of the Bedminster Conservation Area, which covers the western and northern edges of the area. The ‘story map’ on the Whitehouse Street website includes a map showing the listed and locally listed buildings in the area. We support the retention of cobbles on Stillhouse Street. All these heritage assets are important and need to be respected.

We support the statement: “Key city landmarks to the north-west of the site are visible from the viewpoint in Victoria Park. Views to these landmarks will need to be protected.”

Perhaps reference should be made to WECA’s recently launched Placemaking Charter ?  
<https://www.westofengland-ca.gov.uk/what-we-do/planning-housing/planning-policy/placemaking-charter/>

### 2) Heights, scale and massing

We are pleased to see guidance on building height (unlike the Mead Street framework). The guidance is 'amplified height' (an Urban Living SPD term) of 5-8 storeys everywhere except for one site, giving due recognition to the existing older buildings. This seems reasonable for the framework, but we support the statement that this must be justified for each development proposal, and that amplified height will not be appropriate on all sites.

It is not clear what "scale and massing appropriate to the wider context" means in practice. Whilst the framework might not cover this in detail, it might at least list the criteria on which this should be judged, particularly the impact on the street environment, and refer to other documents for more detail.

We note the allocation of a site for a tall building where there are existing mature trees on the edge of Victoria Park, so that a tall building will not block the view from the Park. It is however important to check on the impact on views from elsewhere.

### 3) Land use and employment

We read that the objective is to retain the same numbers employed, whilst covering less space and to "support the **majority** of businesses to stay **if possible** and **compatible with mixed use**" (our emphases). That sounds fine if it is achievable, and we learn that the BCC regeneration team is testing ways of accommodating employment more densely. This feels like a difficult question to answer: businesses already have an incentive not to use land space inefficiently, and some industries are not compatible with mixed-use residential. This is a strategic issue, and plainly there will need to be more detail in the framework to understand the viability of the stated employment objective.

The potential likely reality is that the less tidy, less dense and (for want of a better description) blue-collar jobs are squeezed out. Can this framework document do anything to stop that? The trend to move businesses out of the city centre is not sustainable – it increases the need to travel for work and for customers to access those businesses. Planning policy should do what it can to prevent it and not allow the need for more housing to trump the need for employment space in an area such as this.

We are aware of some valuable existing commercial entities, where the nature of the work means that their employment space cannot be densified, for instance, the Fiddlers venue and the BV Studios workshops. It is important to retain educational and training establishments like S&B Automotive Academy in a location which young people can access. The existing businesses will want to know whether future plans allow them to stay. The businesses whose uses are not by nature spatially dense will feel the pressure more intensely. Can the framework do anything to reduce the uncertainty?

On balance, we think that the employment objective should be strengthened, even that this whole area should be retained for employment uses given that there will be high density residential development in close proximity to it. Reducing the range of local employment opportunities undermines the 15 minute neighbourhood approach.

### 4) Transport and movement

We support the restrictions to stop rat-running.

We regret that a possible bridge across from Whitehouse Street to Ship Lane is 'not being

pursued for now'. It is on a desire line to the city centre for pedestrians and cyclists, and would reinstate a historical route. The reason is not explained: is it because it is judged unlikely to be able to prioritize the funding of this in the foreseeable future ? Could it be funded by developers through s106 or CIL contributions ?

We understand that work on Bedminster Bridges has funding allocated from section 123 CIL money, but we have not yet seen any plans. Currently Bedminster Bridges are a very poor environment for pedestrians and cyclists. If both directions of motor traffic were confined to the west bridge, the east bridge could be made pleasant for those on foot and on bike, as a substitute for the Ship Lane bridge if that is not built.

We are pleased to see the two historic alleyways through to Bedminster Parade re-opened.

Clarke Street and Stillhouse Lane are on a pedestrian desire line. Stillhouse Lane is cobbled and the pavements are narrow – not good for wheelchairs, pushchairs or mobility scooters. The route needs improvement.

We note that there is no reference to the use of high quality materials for street improvements/provision.

#### 5) Open spaces and green infrastructure

We welcome the addition of street trees, which will do much to soften the hard character of some of the streets, eg Princess Street. It will help meet the objective of "Create a neighbourhood which has been designed to cope with the impact of global heating on the local climate". There should be acknowledgement of the need to maintain trees and green spaces, and developers should be responsible for upkeep as well as initial provision.

We are concerned that these developments are drawing on existing community and green infrastructure without adding much of their own. We note the welcome addition of (presumably indoor) community space but are concerned that Victoria Park could become overwhelmed. We would like to see some calculation of how much average meterage of greenspace will be reduced in the area as a consequence of these and other developments.

#### 6) Delivery – affordability %

This framework concedes the level of provision of affordable housing before planning applications have been made - "...the level of affordable housing that can be delivered in the first phase may need to be reduced below the 30% required by current policy...". This is presumably based on discussions with developers and a judgment of economic viability. Would it not be better to stick with the 30% policy in the framework, which would be subject to site-based viability assessments at the time of a planning application?