



an independent force for a **better Bristol**

Consultation response on draft City Centre Development and Delivery Plan

General comments

As a civic society, we focus on the impact of plans and developments on people, place (the built environment) and planet. We look to encourage good planning and design and the successful blending of the new with the old. We want to add to the beauty, character and diversity of the city, and to revitalise areas and improve the quality of life for all across the city. With this in mind, we welcome the steps being taken to clarify the policies to be adopted in the city centre, given the current pressures for significant redevelopment.

In this regard, we note that the City Centre Development and Delivery Plan (CCDDP) “represents early stage concepts and ideas . . . , which will be developed in more detail . . .”, and Part A lists 14 further pieces of work to come, and Part B lists several further studies for Castle Park. A number of these, not least the tall buildings strategy, are likely to be significant in shaping the city centre. The content of other studies will determine what the concepts and ideas mean in practice and, at times, whether they are workable. We appreciate that not everything can be provided at once, and we have no objection to follow-up work detailing what is set out in the CCDDP. But a balance has to be struck with ensuring sufficient information is provided to allow for intelligent consideration and meaningful comment. At the moment, parts of the CCDDP have a somewhat ‘woolly’ feel to them and because of this it is not clear quite what will emerge from the aspirations and ideas. This is not helped when early-stage concepts are generic in nature and could be applicable to many places. This means our comments, and where we provide support to proposals, are subject to a general qualification that what we say is dependent on what emerges from the further studies.

It is also important the city centre isn’t seen as an island, divorced from nearby communities. For example, it would have been helpful to have seen consideration of the wider ramifications of the proposed transport measures. If tall buildings are seen as part of the anticipated development morphology, then it is important to understand and consider their impact on, for example, heritage assets, established views as well as their compatibility with the shared ambition for Bristol to be carbon neutral by 2030. You will have seen our response to the proposed redevelopment of the Premier Inn hotel.

We, and many others, want to have confidence that the CCDDP will lead to the successful rebirth of the city centre. Currently, we do not have the clarity, granularity or certainty of council policy and intent to give us that confidence. We are particularly concerned this plan will not change the current piecemeal approach to redevelopment. We also remain to be convinced that the aspirations, many of which we support, will be delivered. Not least because there are matters that the council could be getting on with now, such as tidying up the public realm and reducing the fear of crime, and are not, or at least not successfully.

We have structured our response in two parts. First, we pose and address (five) questions that are central to the success of the CCDDP. Second, we provide detailed comments section by section.

The fundamental questions

1 Does the Plan do enough to shape new development in Broadmead?

Broadmead is undergoing major change and a masterplan, supported by a design code is urgently needed. Whilst the CCDDP is a welcome initiative to take the city centre in the right direction it only takes it so far. For example, the Plan is incomplete without setting out a clear policy on the height, mass, mix and density of new development. Equally, as the government has set out in the recent consultation on local plans, spatial visualisations are critical to understanding the sort of place that will emanate from land use and design policies. There should be a shared vision, or at least a common understanding of, what the CCDDP will mean for how the city centre will look.

We are deeply concerned that this Plan will not change the current piecemeal development of inappropriate tall buildings which are adversely affecting both the distinctiveness and liveability of our city. Tall buildings disrupt important views across and through the city centre. The value of these strategic views to the character and sense of place has been recognised in previous planning documents but not here. This is a significant omission.

The planned "tall building strategy and design code" (flagged in the text on page 57 of Part A, but missing from the list of 14 pieces of further work) is needed now. Looking at the map on page 22 of the summary document (also on page 22 of Part A), the areas of redevelopment are almost entirely the ones we already know about: St Mary Le Port, the Galleries, Callowhill Court, Debenhams, Premier Inn, the Castle Park energy centre site. Proposals for these developments are coming through now and it seems that what should be a shared vision is actually being set by developers and their proposals.

The 'Land Use and Development' strategy covers very little on the physical aspects of the site redevelopments, in particular on height and density. All it does is to set a target for the quantum of each use (residential, student, office, retail/leisure/culture/community), and prescribe active ground floor uses with zoned areas of like uses. **The Plan should explain how these quanta were arrived at, and include urban design analysis to show that they can be accommodated satisfactorily.**

We are curious to read of the planned "Internal council guide for development on Bristol City Council freehold sites". Why should such a guide not be part of the published Plan? Is the guide only for sites where there are no leases, only freehold?

2 How much leverage can be gained from the Council's land ownership in Broadmead?

The Plan suggests that the Council as land-owner has leverage to influence developers, as the Council owns the freehold of most of Broadmead. But we note that a consolidated lease¹ was

1 <https://democracy.bristol.gov.uk/documents/s12177/17b%20Callowhill%20Cabinet%20report>

granted to the Broadmead Alliance in 2017 and the terms of the lease have not been published, and so we do not know what powers that gives the leaseholder(s). The same may be true of the Galleries site. The Plan seems to concede this point when it says: "The Broadmead area has more mixed ownership and control, and therefore the focus is on the streets and public realm, ground floor uses, and specific community needs such as social infrastructure."

The Plan could usefully explain exactly what is within the Council's influence and what is not: it is important that the Plan does not promise more than can be delivered. The Plan could show an ownership map, showing what Council land is leased and what is not. And for each plot, for example, can ground floor use-type be influenced? This is an important question, as influencing ground floor uses is a major element of the Plan.

3 Are the planned new pedestrian routes, consistent with the area's topography?

Part of Bristol's character derives from its hilly nature. This can be an asset that can be exploited. We would encourage pedestrian routes to be designed to maximise views: of ridgelines, heritage assets and green and blue infrastructure. Equally the topography can be a barrier for many in the community. The CCDDP should therefore address this, and avoid mischaracterising what is proposed. For example, as the developer's proposals for Debenhams have shown us, the reality of the proposed civic boulevard, because of the difference in levels, would be flights of steps criss-crossed with ramps. In such an instance boulevard does seem a misnomer.

While we welcome the priority given to pedestrian routes, we are concerned that some of the routes shown on the map ignore big changes in level: this is acknowledged in the Castle Park design considerations (page 112 of Part B), but otherwise the diagrams showing the pedestrian routes make no comment on the topography. **We think the Plan should say more about how the design of the routes would address the level changes:** without this, the proposals lack credibility. In addition to the proposal for Barr Street, the main example of this is the route from the end of Merchant Street up to Castle Park: there is a large height difference to be managed within a short distance: it does not look credible. Also, the steep route at the north-east corner of Castle Park only looks possible if the slope starts outside the boundary of the park.

We also wonder whether the big height difference for the proposed secondary harbourside walkway at water level, and its isolation from the park, will make it unattractive to most people.

4 Are all the proposed changes to Castle Park needed?

The eastern end of Castle Park has always felt under-used, so it is understandable that the Plan focuses on improving the area - key project 2. The proposed changes - Penn Street gateway, Castle Street gateway, Merchant Street gateway - will be expensive.

We have reservations about the proposed Penn Street gateway:

- the eastern end of the park is less used for a reason: it has less residential or office accommodation near it. That is changing to some extent - with the development of Castle Park View and proposals for the Castle Park energy centre, but we feel that Merchant Street and Old Market will continue to be on much stronger pedestrian desire lines than Penn Street

[%20and%20appendix%20A%20B.pdf](#)

or Castle Street. There is potential in theory for opening up a route to the north-east corner of Castle Park from the east, via the cut-through to Temple Way and across to St Judes, but will this be used much in practice ?

- the Penn Street gateway will involve demolition and rebuilding of substantial walls and earthworks, and installation of a lift. Is the cost/benefit justified, when compared with other city infrastructure projects that might be funded ?
- once in Castle Park at the eastern end, the feeling of enclosure by the trees makes for a peaceful environment, a haven from the city noise, and opening up the north-east corner might threaten that.

The big height difference - 7-8m - at the north-east corner is a natural barrier, and perhaps we should just accept it as it is ? **Rather than a large infrastructure project at the north-east corner, the remedy for the eastern end of the park may have more to do with maintaining the tranquility created by the landscaping and trees at the far eastern end, whilst encouraging occasional activity in the open space** (the Plan proposes a 'City Events Lawn')

We are also doubtful about the proposed secondary harbourside walkway at water level. We say more in our comments below.

5 Will the CCDDP deliver and sustain quality in the public realm and ensure it is inviting to all?

Improvement of public realm is a central theme of the Plan, and one therefore we support. The quality of that public realm across both Broadmead and Castle Park is hugely important to attracting investment and making local people's lives better. The Council does not always use quality paving and other materials in its public realm projects, and the current Broadmead paving looks cheap compared with Cabot Circus. **The Plan should commit to use of quality materials**, which is arguably more worth spending money on than the Penn Street gateway.

Quality is not only a capital cost issue: the ongoing maintenance is vital too, both for the hard surfaces and the extensive new greenery and urban drainage that is proposed. In an era where Council finances have been squeezed by government cuts, **it is essential that the Plan should be clear on how maintenance costs will be funded and delivered, in perpetuity.** Otherwise the "patchy repairs and reinstatement of variable quality" (page 89 of Part B) will reoccur. We are concerned that maintenance of Castle Park is not to be considered until a 'future design stage' (p146 of Part B).

No one should be disbarred from the city centre because of concerns about their personal safety. There is recognition of this in the consideration of lighting, but better lighting (if appropriate) is not the sole answer. Attention also needs to be given to the design of thoroughfares, the mix of uses, and how streets are managed so they feel safe and welcoming, including dealing promptly with litter and uninvited graffiti. Developing a policing strategy should go hand in hand with encouraging an expansion of the night-time economy particularly when drinking establishments are concerned.

[Detailed comments by section](#)

[Part A](#)

Vision and strategies

Although “this Plan presents a local application of wider policies, strategies and guidance ...” (p24 of Part A), it is not clear whether the CCDDP is hanging off the extant local plan or anticipating the new one, or it is meant to be a hybrid document with its own separate status in the city council’s vision for the city centre. It doesn’t occupy any obvious place in the new local plan architecture set out in the Levelling-up and Regeneration Bill.

We support the vision and 6 themed strategies in principle, but we question whether the Plan is complete without influencing the height, mass and density of new development.

Destination and Identity

We feel the proposals are generally too high-level to be able to comment in a meaningful way. We do, however, welcome the commitment to provide more public toilets which are much needed, especially after the closure of department stores and the imminent closure of the Galleries.

Community and Culture

We feel the proposals are too high-level to be able to comment in a meaningful way.

Movement and Connections

We support in principle the emphasis given to improved walking routes and increased cycling provision.

We welcome in principle:

- closing city centre streets to private motor traffic, subject to understanding the wider impacts of displaced traffic;
- enhancing pedestrian connections and crossings;
- restricting car parking (assuming that the planned mobility hubs provide adequate access via blue badge parking and taxis).
- consolidating car parking to locations accessed from the perimeter roads,
- encouragement of logistics hubs, subject to appropriate siting and utility; and
- car-free development.- making future site development car-free

Therefore, while we support the broad thrust of the transport proposals, we are unable to give our backing to specific proposals without more information about:

- how they will impact wider traffic flows and travel options in the city,
- their effect on residential areas bordering the plan area and more widely (given the proposed logistic hubs) and
- where they necessitate a building’s demolition, the implications for embodied carbon.

The first bullet under Bus & Mass Transit is:

“Create opportunities for improved public realm for pedestrians by relocating bus stops away from overcrowded key streets. Overall improved walking routes and better quality bus stops will be balanced against the small increase in walking distance for some stops”

The Plan should consider the impact of increased walking distances on the less mobile. We note on page 31 of Part A the proposed 'mobility hub' at the top end of Union Street, on the corner of the Galleries development: "*Provision for a new mobility hub, to consolidate blue badge parking, taxi rank, pick-up/drop-off area, e-scooter and cycle parking services into a high quality facility*". But this does not address walking distances within Broadmead.

We note on page 46 of Part A "• *Introduce new shop mobility services and 'hail a ride' supported by mobility options at a proposed mobility hub at The Galleries to mitigate increased walking times at Quakers Friars*". This needs explaining more clearly. Mobility services may mean mobility scooters for hire? Might 'hail a ride' be an electric minibus shuttle operating within the area, as in Toulouse? What sort of frequency would these services have and who pays? Without sufficient attention to details such as these, parts of our community would, in effect, be excluded from the city centre.

Public Realm and Open Space

❖ Approach - street hierarchy

In the diagram, the "primary public space" at the top of Union Street and at the end of Penn Street are accompanied by none or light flows of motor traffic, but not that at the Haymarket end of Union Street. It's not clear that a primary public space is possible at that point, not without downgrading Rupert Street and Lewins Mead, and even then there will be frequent buses passing through the junction. This needs explaining.

The section would be better labelled 'Street hierarchy for pedestrians', as it does not show the street hierarchy for other modes of transport.

❖ Approach - height and microclimate: "Impact of buildings on public space"

It is important to consider the wind, heat and light effects of development on the public realm, as this section does. But it sits oddly against the vagueness on tall buildings elsewhere in the document. It also seems odd to give guidance on height based on the single criterion of microclimate, without considering the other criteria for guiding where greater height is appropriate. The result is a strange diagram where there is a ring of taller buildings proposed which appear to ring the lower level buildings. Better explanation is needed on the relationship between envisaged buildings and wind, heat and light effects, so that the diagram is understandable to the reader and of utility in designing the city centre's future.

❖ Approach - study area interventions

We support the proposed interventions for enhanced public realm listed on page 58 of Part A, with the exception of:

- the Penn Street gateway to Castle Park. See our comments elsewhere in this response
- the extension of Merchant Street through the Debenhams site, as it requires the demolition of the existing building and, as proposed by developers, its replacement with a very high tall building: an unacceptable trade-off in view of the city's ambition to be net zero by 2030 and the wider impact on the city's character.

❖ Approach - Open Space Quantum

We support the plans to maximise available open space, as illustrated on page 59 of

Part A, particularly given the proposed more residential nature of the city centre. Given the current level of under-provision described on that page and on p61 (10% public open space compared to 29% in Bristol as a whole), we question whether a 40% increase (to 14%) will be enough. The population is forecast to increase by 80%, mainly in very high blocks of flats without individual amenity space and including families. Further, the deprived areas to the east and north lack adequate open space, so that the central area should serve them too. Then there are the office workers and visitors... Parts of Castle Park and Queen Square (as noted on p51) already get crowded at peak times, just with people sitting. If other activities are to be accommodated as proposed, then more space will be needed.

We welcome the commitment to making 20% of the public realm 'playable' - a footpath should not be the only place where you can kick a ball around, as the report's illustrations suggest.

Green Infrastructure and Nature

We very much support the development of high quality green infrastructure for people to enjoy and to counter the urban heat island effect, which will be exacerbated by climate change. But given other pressures on space and the limited levers at the City Council's command, we have serious doubts about the detailed proposals. In Broadmead we have concerns about enforceability and the practicality/desirability of greening all buildings. In Castle Park we are concerned that over-zealous attention to biodiversity gains could reduce the park's amenity value. (The site photos on p 62 show some of the ways excess vegetation can inhibit recreation). ***We do not think the same targets should apply throughout the area.***

In more detail:

- ❖ **Objectives – to deliver transformation (p63)** The suggestion that green and blue infrastructure requirements should be imposed on all developments seems unrealistic and expensive (though we note that there is already something similar in relation to buildings in DM29). Should it not apply only to development over a certain size or a certain sort? How can people be required to maintain green roofs or walls? We would anyway caution against unqualified support for concepts such as vertical greening and vertical forests without considering both their utility and consequences for carbon. To survive, and contribute to cooling and biodiversity as intended, plants need water. Artificial watering has a carbon load, both in getting water to a site and up a structure. Constructing the type of building illustrated on page 89 of Part B requires significant structural reinforcing to carry the forest. This, additional, embedded carbon can be significant and brings into question the compatibility of encouraging such structures with the city's ambition to be carbon neutral by 2030. .]
- ❖ **Approach – green infrastructure interventions (p65).** We generally support these proposals, with a few reservations about points 1 and 6. On point 1, we can see some justification for developments round Castle Park to be required to be 'green'. Again we are unclear how maintenance of greenery can be enforced. We question whether green roofs are anyway needed on buildings above a certain height as they will not be visible. On point 6, which proposes species-rich planting, we [e would encourage giving attention to vector-borne diseases in a changing climate when designing green and blue infrastructure. For example, certain forms of blue / green infrastructure, including those

SUDs involving storage, will foster mosquito population growth with the consequent implications for health. Likewise long grass and other vegetation in amenity areas can harbour ticks and other disease-bearing insects.

- ❖ **Approach – targets (p67)** We suggested in the previous section that the proposed 40% increase in open space was insufficiently ambitious. In contrast, several of the other suggested targets seem too high. Further, they fail to take account of the differences in tenure and land use across the area. In Castle Park the targets are likely to do harm: elsewhere they will be ineffective. We are particularly concerned about the proposal to require a minimum 25% biodiversity net gain from all developments. This will be easily achieved on brownfield sites in Broadmead by incorporating a living roof, which will bring no benefit to most people and which may not be maintained. It will be much harder to meet the 25% target when building a playground or café in Castle Park. It is likely to result in inappropriately dense vegetation being planted on the site or nearby. Likewise the target to plant 150 trees may lead to too much vegetation in Castle Park, where planting will be easiest. Indiscriminate tree planting could limit the amenity use of the open spaces in the park. The target of 50% living roofs seems strange without any suggested criteria for deciding which buildings should have them.

Land Use and Development

Given the city's net zero ambitions and the Secretary of State's recent decision to retain the M&S building in Oxford St, we would have expected much more encouragement of building conversion and reuse.

A key issue for the Plan is how to provide a coherent direction in the face of uncertainty about high street retail and in the absence of the analysis from BCC Economic Development intended to support the Local Plan Review. The planned approach (on pages 73 and 74 of Part A) of focusing on ground-floor uses, and proposing clustering of certain use-types on certain streets has a logic to it. However, the plan should make clear that prescribing use-types is outside planning control, and state ways in which use-type can be influenced. The only constraint on uses above ground floor (on page 71) is via targets for the quantum of each use (residential, student, office, retail/leisure/culture/community). It is difficult to see how much influence the Plan will have.

- ❖ **Approach - Diversify & Intensify**
This section includes targets for the quantum of each use (residential, student, office, retail/leisure/culture/community). The Plan should explain how these quanta were arrived at, and include urban design analysis to show that they can be accommodated satisfactorily, if indeed they can.
- ❖ **Approach - a Place to Live**
Most of the proposals are high-level, many duplicate policies elsewhere, and so we find it difficult to make a meaningful comment. The design codes for family apartments and tall buildings are needed now.
- ❖ **Approach - Active and Ground Floor Uses**
This forms an important element of shaping future changes in Broadmead. The Plan

should explain what is within the Council's influence and what is not: it is difficult to see how this can be achieved through planning decisions given the combination of Use Class E and extant permitted development rights?

- ❖ Approach - Promoting Sustainable Development
Most of the proposals are high-level, and many duplicate policy elsewhere, and so we find it difficult to make meaningful comments. However, this approach should give clear guidance on energy use and carbon and a clear priority for the use of existing buildings. We would have more confidence in the City Council using its influence as planning authority in future if it had not already approved some clearly unsustainable developments.

Delivery strategy

The planned "tall building strategy and design code"(flagged in the text on page 57 of Part A) but missing from the list of pieces of further work on pages 80/81. We suggest that a recreation strategy is needed too. As far as we can tell, green leases are likely to be of limited use. They can be helpful in promoting energy efficiency but not the sort of greenery stakeholders are most concerned to see in this area.

Part B

Broadmead Placemaking Plan

In general we strongly endorse the points made in the engagement feedback and welcome the proposals for 'greening the grey'. The removal of traffic should make it possible to achieve the full range of benefits listed on p91 overall. But in places there may be conflicts to be resolved, for example between ecological enhancement and the quality of the public realm experience. It would be helpful to prioritise the list: in our view the quality of the public realm experience should be paramount.

Street types 1 to 7

1. Linear Street Garden (Connecting Quay Street – Nelson Street - Broadmead - Cabot Circus)
The removal of buses from Nelson Street is welcome, but it is not clear how the Plan's pedestrianization and greening approach can be applied in the part of Quay Street and Nelson Street that remains open to motor vehicles for access only. This needs clarifying. The diagrams on page 47 and 48 of Part A show Nelson Street remaining open to servicing and logistics vehicles, and taxis and smaller vehicles. Currently, there is a continuous trickle of vehicles crossing from Bridewell Street to Fairfax Street, and this seems set to continue.
2. Lanes and Courts (Broadmead)
We agree, subject to our earlier comment about demolition/re-use and net zero, that adding cut-through lanes and spaces could enhance the feel of Broadmead, but only as long as they are kept well-maintained, free of anti-social behaviour and graffiti and are welcoming to all. The creation of these new back lanes and courts is heavily dependent on future development, eg the Galleries and Callowhill Court. We note that two of the new back lanes are in the north-west quadrant, which is not labelled as a potential new

development site, so they may not get delivered. Attracting “independent makers and businesses” to the lanes and courts will depend on the other changes that increase the appeal of the whole area. The delivery mechanism also needs clarifying as the ownership of a business is not a planning matter.

3. Civic Avenue (Merchant Street)

A continuous pedestrian route is a good idea in the abstract but the height differences from the Debenhams building to Castle Park need to be addressed. It is difficult to see how the step-change in height at Castle Park can be consistent with the image shown of the new gateway entrance. We do not support the demolition of a significant existing building to secure a pedestrian route to the St James Barton Roundabout - because of the carbon consequences. It is also a misnomer to label the route as a civic boulevard when (due to the levels difference) it would in reality be flights of steps criss-crossed with ramps. If opening up a route is considered desirable (bear in mind the result could be pollution and noise from traffic infiltrating Broadmead), this could be provided through a re-development to one side of the Debenhams building with much reduced consequences for embodied carbon.

The pedestrianisation of the southern end of Merchant Street will continue to be compromised by the exit of motor traffic from Fairfax Street to Broad Weir.

The open space at the centre of Broadmead, the Podium, is special. The Plan could influence any future development of the space to preserve the four curved corners of the Podium buildings. These are important to the feel of this space and the alteration of any one corner harm the cohesion.

4. Garden Street (The Horsefair and Penn Street)

We support this approach.

5. Active Corridor (Union Street)

We support this approach.

6. Park Edge (Newgate, Broadweir)

[There are some inconsistencies. The Plan includes High Street in the title, but not in the scoping diagram. The Plan excludes Lower Castle Street from the title, but includes it in the scoping diagram. We therefore restrict our comments to Newgate and Broadweir.]

The extension of pedestrianised public realm across Newgate, opposite St Peter’s and the east of the top of Union Street, may work. It will depend on whether the Galleries development at that corner creates the right environment for it. East of that area, we think that Newgate and Broadweir will remain a transit corridor only, and will not be used much by pedestrians.

The Mobility Hub at the corner of Newgate and Union Street will include “blue badge parking, taxi rank, and pick up/drop off spaces and e-scooter and cycle parking”. It is not clear how access to the Hub and turnaround by motor vehicles will work given that they will not be allowed on Newgate.

7. Community Connector and Greener Gateway (Bond Street)
We support this approach

Evening economy and after dark experience

We support the aim of facilitating evening activity and promoting environments that feel safe to all in our communities. The proposals will need to be demonstrably compatible with the high level of new housing proposed, especially that for families and provide a noise environment conducive to the envisaged range of housing, not least for families. We welcome the provision of more public toilets: these are not only needed in the evening.

Castle Park Masterplan

We welcome the recognition that Castle Park is a most valuable asset with great potential for a range of activities.

We support the 8 Key Strategies in principle but the plan needs to be clearer on how improvements are to be funded and maintained. As we have already observed, maintenance should not be considered only at a future design stage,

❖ Design considerations (p 116)

The section on enhancing biodiversity notes that the park is managed with mown lawns to maximise the usable space. We would not want the usable space reduced to enhance biodiversity. The park is already crowded at peak times. There will be many more people to accommodate in future and the engagement process revealed demand for a wider range of activities.

❖ Vision (p118)

We do not see anything in the earlier account of the engagement feedback about enhancing biodiversity *per se*. (That is not synonymous with enhanced greenery). Given the paucity of green space in this area compared with other parts of Bristol, we do not think this need be an objective. Enhancing the amenity value of the park for people should be the overriding objective.

❖ Park Gateways

We support the approach in general, but we think there should be some prioritisation of how money is spent. The Penn Street Gateway has been selected as one of the Key Projects, implying it has been prioritised over other Gateways. We question whether the high cost of the Penn Street Gateway is worth the benefit gained - see our comments above.

❖ Heritage Re-use/Interpretation

It is essential that the Plan should be clear on how the cost of maintaining the heritage assets will be funded and delivered. With regards to the proposed heritage trail, the Plan does not refer to the heritage interpretation boards have been introduced within the last few years - it would be pointless to scrap them.

❖ Movement - Pedestrian

We support the approach in general.

- ❖ **Movement - Cycle**

We are very aware that the experience for pedestrians along the riverside route through Castle Park is compromised by having the bike path adjacent, but we think the intention to convert the riverside to a leisure cycle route will be challenging, because it is on such a major desire line for cyclists - from Baldwin Street to Old Market. We support the aim to make it safer and more pleasant for those on foot, but the alternative route to Old Market for cyclists round the other three sides of the park is significantly less attractive: some cyclists will do it, but not many.. This is a tricky design issue. Perhaps the delineation between cycle route and pedestrian route could be made clearer? Widening the pedestrian route along the whole length would seem an expensive option.

We note the intention to provide a segregated cycle route on High Street and Wine Street: can these roads accommodate this alongside buses and generous provision for pedestrians? The Plan does not demonstrate the feasibility of this.

- ❖ **Lighting and Safety**

Increasing the feeling of safety in the park is key to its enjoyment but the lighting strategy should ensure that wildlife ambitions are not compromised.

- ❖ **Green Infrastructure**

As explained above, we think enhanced biodiversity should be encouraged only insofar as it adds to the amenity value of the park for all. Active play and picnics are not possible in many habitats.

- ❖ **Play**

We support the two proposed play areas. The previous play area was out of sight at the eastern end of the Park, and was not used. It seems right to site the areas further west, to the more frequented end of the park. While the plans for these and other facilities in the park are exciting, we hope there will be sufficient areas of amenity grass for children to run around,

- ❖ **Facilities and Events**

It is important that increased numbers of events do not curtail enjoyment of the park by the wider public nor that they unduly disturb residents, many without their own private green space. The proposals need to provide a balance between activity and tranquillity to meet different user requirements successfully.

We are glad that public toilets are to be provided. We support “a proposed park pavilion to include a cafe and toilets” by St Peter’s Church (page 105). Provision of toilets within the Park is important. [On page 134, it says more vaguely that “WCs are proposed to be located near the heart of the park”. We presume this means in the pavilion.] It is important that their availability should not be limited to the pavilion’s opening hours.

3 projects

1. **A New Heart to Castle Park**

We support the approach in general and would particularly welcome expansion of the

Physic Garden.

Making good use of St Peter's Church is difficult. If this is a quiet space for sitting, will it be popular if it has an enclosed feeling ? Will there be more than one entrance ?

The large paved area to the north of St Peter's Church is currently under-used. As well as opening out the space to Newgate, the proposals for this paved area are for: "a more useful, multi-functional space for a range of uses for the City Centre. ... a focal point for community events including opportunity for weekly and seasonal events such as markets and outdoor performances." Events will provide activity from time to time only. The description of the 'Park Edge' on page 105 additionally proposes "A *park pavilion to include a cafe and toilets*", and this will provide more permanent activity, as will the two play areas at either end. We support all this in principle. We would emphasise that the existing large expanse of hard standing needs to be reduced, whilst not compromising its use as an event space: perhaps more trees would break up the space?

2. Eastern Gateways and Event Meadow

The Penn Street Gateway has been selected as one of the Key Projects, implying it has been prioritised over other Gateways. We question whether the high cost of the Penn Street Gateway is worth the benefit gained - see our comments above. Can it be designed to be less ambitious and with a lower cost ? The Merchant Street Gateway would seem to have a better cost/benefit ratio.

We assume that the 'Events Meadow' will host events only occasionally. At other times it will remain a tranquil space, cut off from the surrounding city noise by the embankments and trees. If the Penn Street Gateway is to be built, we suggest that it is not too wide, because otherwise it will disrupt the tranquillity of that space.

The images on page 140 seem to suggest a notable increase in hard landscaping which would increase the heat island effect. The same consideration applies to the events meadow area (Fig 139, Page 141). That image also seems to flatten the 1970s embankments: we assume the embankments will remain unchanged.

We support removing some of the wall on Castle Street to open up the entrance to the Vaults cafe and the Events Meadow. But we suggest there is no need to remove it altogether, just open it up opposite the outdoor seating area in front of the cafe. People are unlikely to sit on the proposed terraces looking *out* of the park onto Castle Street and Castle Park View.

3. The Floating Waterfront Edge

We like the idea of enhancing the connection between the Park and the river, but we wonder whether the big height difference for the proposed secondary harbourside walkway at water level negates any connection with the Park. Its isolation from the Park may make it unattractive to most people and we suspect that it wouldn't be used much. It might provide value as a place-to-be, rather than a route from A to B, but only if there are pleasant places to sit. Is it worth spending money on it? Would expanding the proposed viewing platforms at the level of the Park provide more connection between the river and the Park?

Recommendations and next steps for Castle Park

The proposed ecological survey needs to be based on the premise that enhancements must not reduce the amenity value of the park by reducing the space for a wide range of activities. We have already noted that the funding of maintenance needs to be considered earlier than a 'future design stage'.

END