



an independent force for a **better Bristol**

January 2025

## **Bristol Civic Society response to Broadmead design code consultation**

### 1 Introduction

We give our comments below on the draft document. We first commented in 2024 before the consultation started, following a briefing at an invited stakeholder meeting with the project team. In this response, we include our earlier comments, adapting them where appropriate in the light of now seeing the full consultation document and the associated Q&As.

### 2 General comments

#### 2.1 Bristol design guidance

The current policy documents are not providing strong enough guidance for developers. We have yet to be convinced that that will be changed by the proposed suite of new documents (City Design Guide, Broadmead design code, Broadmead public realm guide, the updated Urban Living SPD). The incoming administration has an opportunity to do a reset.

We need a vision of what is wanted for the city centre, especially where across the whole area tall buildings are envisaged and where not, and of what height. That is what is missing.

We have made exactly that point in our response to the Local Plan Review consultation:

*“To reflect the NPPF’s requirement that “Design policies should be developed with local communities so they reflect local aspirations” this plan should include a spatial tall buildings policy developed with full public participation. And in the meantime, take a precautionary approach to the siting and height of tall buildings, recognising that the Bristol public does not want tall buildings of the height encouraged by the council.”*

and

*“A spatial tall buildings policy is needed, which takes account of city panoramas and views, a townscape assessment that both considers the quality and heritage of current environments across the city, building on conservation area character appraisals, and protects this character from inappropriately sited and sized tall buildings.”*

#### 2.2 Change in Broadmead

The SPD introduction says: “Transformational change: Broadmead forms a part of Bristol City Centre and like much of the country has seen structural changes to the way people shop and visit retail centres. Its largely retail-focus, low scale and concealed diversity present it as a prime destination for reinvention and a number of local drivers are setting Broadmead on a path toward transformational change.”

The Society is not against change. We accept that Broadmead has to change. Internet shopping and the housing crisis require fewer shops and more residential accommodation. The mix of building uses in Broadmead has to change accordingly, as described in the City Centre Development and Delivery plan (DDP).

We see the challenge as: "how do we change Broadmead to respond to new realities while keeping and reusing the best of what exists?" It must be an area of the city where people live, work, shop and play that serves the needs not just of the new residents expected to live in the area but also visitors, tourists and other Bristolians who will value the new Broadmead as an attractive city centre destination. We favour medium-rise dense housing, as seen in the mixed residential+ground floor blocks in Paris and other European cities.

### 3 Main comments on the document

We consider that the draft design code is too generic, too long and mostly unrelated to Broadmead. It contains far too much information that is unnecessary and duplicates other relevant planning guidance. It should be entirely rewritten.

One of our members, an architect, suggests that you might look at the Design Code that is Appendix 3 in the [Old Market Quarter Neighbourhood Development Plan](#) which is two pages of A4 and covers all the aspects of urban design that relate to streets, boundaries framing the streets, buildings that front on to streets and the materials that they are built of. Although simple, Old Market Community Association (OMCA) find it works well when commenting on applications.

In more detail ...

#### 3.1 'Comply or justify'

The 'Comply or justify' approach that is described in the SPD's introduction is at the core of the objective of design codes as part of planning policy reform. However, in practice compliance is not as black and white as a simple description of the approach might imply. There is a red/amber/green checklist in the Urban Living SPD that many applicants use to show compliance or otherwise: this is worth considering for this SPD.

#### 3.2 The context of other planning policy documents.

We support:

- There is a helpful early section guiding the reader through other relevant policy documents
- Each section of the design code repeats the relevant references to the Local Plan, which is useful. They also cross-refer to other 'references and best practice', which is also helpful.

We have several comments:

- As the section refers to another DPD, strictly speaking the title of this section changed to 'How does the SPD relate to Planning Policy and Guidance.' - adding a reference to 'Guidance'.

- We understand that the SPD will sit alongside a **citywide design code**, but it will not be public before the Broadmead design code is agreed. Nor does this design code refer to it. This seems unsatisfactory.

- We understand that the SPD will sit alongside a **Broadmead public realm guide**, but it will not be public before the Broadmead design code is agreed. This seems unsatisfactory.

Some policies in this design code refer to a 'Landscape and Public Realm Design Manual, Bristol City Council (2024)'. Is that the to-be-published Broadmead public realm guide, and if so why is it not explained in the introduction?

Will the Streets and Spaces policies in the design code be duplicated in the Broadmead public realm guide?

- We understand that both this design code SPD, the citywide design code, and the Broadmead public realm design guide sit under the draft revised **Local Plan**, in which Appendix B lists high-level design principles. It also sits alongside the **Urban Living SPD**, which is due to be reviewed. To avoid confusion for developers and other users, we suggest that the number of design documents needs to be reduced, and that the set of design documents should be structured so that there is little or no duplication. This is in line with the government's stated aim to reduce duplication of planning policy guidance.

For instance, is a citywide design code really needed as well?

Many of the policies in this design code seem generic - under all 4 headings of Neighbourhood, Streets and Spaces, Buildings, Home. It seems to us that nearly all the policies under Building and Home are not Broadmead-specific. Home in particular is adequately covered in the Urban Living SPD and should not be included in the Broadmead Design Code.

The Broadmead design guide duplicates what is in the (to be revised) Urban Living SPD and there are many differences in details between the two documents that will only lead to confusion for applicants and planning officers. The Urban Living SPD has become well-used and understood guidance, and it would be best to build on that by including generic guidance in that document only. If that is done, the cross-reference to the Urban Living SPD needs to be given greater prominence here. With such de-duplication, the Broadmead design code SPD could be a much shorter document.

- The SPD refers to the **National Design Guide**, but not to the **National Model Design Code** (NMDC). By way of comparison, the NPPF consistently refers to both. Is there any reason why the SPD does not refer to both? Has the SPD made use of the National Model Design Code? We would expect the SPD to cross-refer to it throughout the list of policies. We would not expect the SPD to duplicate the NMDC. It is not obvious how to demonstrate consistency between the two without duplicating.

- The Broadmead design code will sit alongside the **City Centre DDP**, and the revised Local Plan refers to the DDP. However, the DDP is not an adopted planning policy document, not even a SPD possibly because it could not hang off the existing Local Plan. This is acknowledged in the design code, where it comes under the heading of 'references and best practice', not planning policy'. Is that arrangement effective? Can the DDP be adopted once the new Local Plan has been adopted?

- given our comments below that this document does not feel Broadmead-specific, the need for readers to use the design code alongside the neighbourhood-level DDP needs to be highlighted in big bold letters at the very start of the document, to supplement the references in the introduction and policy N.1.

### 3.3 Broadmead-specific context, character, heritage

As we understand it, the treatment of context, character, heritage in the draft SPD can be described/explained by the following:

- two of the consultation statement's Q&As are on context, character, and heritage; they list the ways that the document is Broadmead-specific, via references to Old City, individual heritage assets e.g. 'The Hub', and a list and map of all Listed Buildings and Locally Listed Buildings.
- policy 'N.9 Proposals enhance the setting of heritage buildings and retained fabric through visual distinctiveness', including an 'urban design toolkit' and a 'detailed design toolkit'.
- 'spatial principles' including 'character-led height', responding to the location of listed buildings
- that the code is designed to work with the DDP, including Chapter 5 - Broadmead Placemaking Plan, and page 9 gives a broad overview of the DDP's coverage.
- that the code is not prescriptive, giving options for eg materials and colour

These things are helpful, but not enough. The illustrations of design types on page 17 of the SPD are of buildings that could be anywhere. We found it difficult to relate the images to Broadmead as we know it, and therefore we found it difficult to relate the whole document to Broadmead. Why not select good examples from Bristol?

Neither the DDP nor this code indicates where in Broadmead development is more likely. For instance, the area includes Cabot Circus, where development is less likely. They take no account of recently approved tall developments: Premier Inn, Debenhams and very soon The Galleries. They suggest broad sub-areas of varying height, without giving an overall vision of what Broadmead might look like.

How can we get a picture of what Broadmead will look like having applied this Code, reflecting what makes Bristol distinctive? How do we get a sense of how the design code's detailing makes sense in the context of the DDP's master plan? Does a place-specific design code have to feel as generic as this document feels?

The National Model Design Code Part 1 (NMDC) says that "all new buildings should take into account the architectural character and materials of the surrounding area" (Para 53, page 23). It then goes on to say "all schemes should be designed to enhance local character and eligibility by - making use of local materials and detailing..." (Para 62, page 32). We would expect a local Design Code to address this in detail and include walls, roofs and windows in its consideration.

### 3.4 Community engagement

The engagement process does not seem to be following national guidance, which is as follows: Para 134 of the NPPF (Dec 2023 version) says "*...all guides should be based on effective community engagement and reflect local aspirations for the development of their area...*". Para 138 says that should be "*... through the preparation and use of local design codes, in line with the National Model Design Code*".

The Guidance notes on the NMDC, para 232 'Measuring Community Support', say "*...those leading engagement will need to consider how they can demonstrate measurable community*

*representation and support to ensure Codes are based on what is popular locally, on the basis of evidence."*

The intention behind design codes was to give local communities some say over the type of development taking place so that there is some degree of "ownership". We suggest that the Council needs to do more to achieve that.

### 3.5 How much redevelopment?

The design code seems to assume demolition and re-build. We would want to avoid new development that is worse than what it replaces. This design code should refer to the possibility of retaining existing buildings.

Design codes do not work so well in an existing place, because they are about new development, not what already exists. But they are incomplete if they do not consider the existing buildings.

The Broadmead design code deliberately does not repeat what is in the DDP. This means that it does not repeat the DDP guidance (page 81) that "a key consideration for development is whether the adaptive reuse of existing buildings is feasible". The design code lacks that guidance, and thus seems to assume demolition and re-build. This is one example where duplication seems essential: the code needs to include the same message, and expand on it.

This design code could make such guidance Broadmead-specific by commenting on the potential for re-use of the types of existing buildings to be found in Broadmead.

### 3.6 Boundary map

For clarity, it would be helpful to include a boundary map at the start of the design code. In the draft document's introduction, reliance is made on the DDP's boundary map, but maps on subsequent pages show a smaller area than the DDP, without defining the boundary of Broadmead, which is confusing. The map, image 1 (note: there are two image 1s and two image 2s in the document), on page 9 of the SPD is taken from the City Centre Development and Delivery Plan (Part A) page 63 and is a diagram relating to building height parameters. The plan on page 22 of the City Centre Development and Delivery Plan would be a better plan to use.

(The boundary of Broadmead familiar to Bristolians would be defined by Penn Street, Bond Street, Haymarket, Bridewell Street, All Saints Street, Union Street, Newgate and Broad Weir. The plan on page 22 of the DDP is close to this but includes a mix of selected extensions.)

### 3.7 Tall buildings

We support the inclusion of the following type of guidance:

- The 'Prevailing heights framework' on p21ff of the document, and the 'spatial principle' of 'character-led height' is useful guidance. Guidance on acceptable height has been lacking to date.
- Policies B10 to B16 on 'Tall building design' are useful guidance (but are generic).

We have several comments:

At present (pp 21-23) the draft SPD suggests different height maxima for different “character areas” in Broadmead:

Conserve - Historic core: 3-5 storeys

Enhance - City fringe: 5-7 storeys

Transform - Inner central: 7-10 storeys “with opportunity for tall elements”

Transform - Outer central: 10-13 storeys “with opportunity for tall elements”

Corridors - Heritage: 3-4 storeys;

Corridors - Inner: 5-7 storeys;

Corridors - Outer: 12-15 storeys

What this means is that essentially the whole of Broadmead will be 7-13 storeys “with opportunity for tall elements”, except for the outer fringe, which will be even taller. This is not acceptable. Unless there are tight height limits, developers will push for tall buildings, and their proposals will be accepted, and Broadmead will be at risk of becoming a dystopia. This is our city, in which we live, work, shop, meet and play, the centre of our collective lives, and the duty of this planning policy document is to ensure a proper balance between meeting the housing need and retaining a sense of place that we can identify with.

The Urban Living SPD’s height parameters have not been followed in the ‘prevailing heights framework’ diagram shown on page 21 of the Broadmead Design Code. There is no justification for proposing building heights greater, and indeed less, than the prevailing height or amplified height. A contextual tall building strategy is required. Tall buildings are defined as anything over ten storeys or 30 metres. Any new tall building should be subject to criteria set out in the Urban Living SPD.

- The code describes the design code area as ‘relatively flat’ (N6, page 15), but the land slopes upwards at its edges. The code seems to create a ring doughnut effect with taller buildings around the outside of the area. It means views out are tricky and that residents in the new blocks will suffer from a feeling of enclosure. It also creates a canyon effect on the surrounding roads, which will not help disperse bad air pollution. And it creates a huge wall against the edge of Castle Park.

Pushing the taller buildings to the periphery is driven partly by the presence of heritage buildings in the centre of the area, and probably partly by the open spaces of Castle Park and the Bearpit on the other side of the Broadmead periphery. We would not argue instead for taller buildings in the centre of Broadmead. Instead, the topography should be taken into account in setting maximum heights around the edge. The limit should be 12 storeys, not 15.

- A building of 28 storeys has recently been approved on the Debenhams site. Will this SPD’s ‘comply or justify’ approach be enough to stop this free-for-all?

- The policies on views - N6, N7, N8 - in this design code should be made Broadmead-specific by considering specific protected views into and out of Broadmead.

### 3.8 Housing mix

We support:

- The document refers to the revised Local Plan, policy DS1A, which “focuses on retaining Broadmead as Bristol’s principal shopping destination but also introducing a greater diversity of mixed uses, including a significant proportion of residential.”
- The document includes policy ‘N.17 Proposals provide a mix of types, tenures and sizes of accessible and adaptable dwellings, including family-sized homes (3 bedroom+).’

However:

- There is no mention of student accommodation (PBSA), which is the reality of current development proposals in central Bristol.

### 3.9 Courtyards

‘Diagram 10 - Prevailing heights framework’ on page 21 of the SPD shows areas of proposed public space. A number of policies refer to courtyards. This is appropriate for Broadmead as the spaces behind the shops are likely to be redeveloped. This theme is something that could be emphasized more in the introduction.

## 4 Comments on design priorities

We support the design priorities, viz the over-arching theme of Liveability, and the 5 principles: Urban vitality, Resilience, Inclusion and safety, Everyday life, Health and well-being.

However, the principles address residents’ needs only, not the needs of all users of Broadmead.

The design priorities make more sense when seen within the framework of other policy documents. It could be helpful to show them alongside the DDP’s 6 spatial moves and the revised Local Plan Policy DS1A’s 5 place principles for Broadmead, Castle Park and Old City, like this:

Local Plan Policy DS1A	City Centre DDP	Broadmead Design Code
		Liveability, under which ...
Create liveable residential environments ...	Destination and identity	Urban vitality
Ensure that the public realm is ... welcoming, animated, of a human scale ...	Community and culture	Resilience
Create new routes through urban blocks ...	Movement and connections	Inclusion and safety
Deliver better connections to Castle Park and the surrounding communities ...	Public realm and open space	Everyday life
Incorporate and enhance the area’s built and cultural heritage.	Green infrastructure and nature	Health and well-being
Tall buildings ... may be appropriate .. in accordance with Policy DC2 ‘Tall buildings’.	Land use and development	

## 5 Comments on the policies

### N Neighbourhood

#### 5.1 Protected views

Three policies cover views:

N.6 Proposals maximise opportunities for the creation of local views towards key buildings, spaces and landscape elements.

N.7 Proposals contribute positively to local views through meeting townscape objectives.

N.8 Proposals contribute positively to long views through meeting cityscape objectives.

Together they cover views into Broadmead as well as out of Broadmead and within Broadmead. The policies should refer to specific protected views into and out of Broadmead.

#### 5.2 Prevailing heights framework

Policy N12 states that ‘a consistent approach to building height is critical to shaping Broadmead’s evolving character and how it relates to the existing and emerging context. Height should be informed by the character of the place envisioned within the DDP’. The map on page 63 of the City Centre Development and Delivery Plan defines: in grey protected sites, in grey hatch where no development is envisaged, in blue where prevailing building heights should be maintained to ensure they have minimal impact on the associated streets and public realm and in purple where amplified heights are encouraged with potential for contextual tall buildings to be determined through tall building strategy.

Analysis of the buildings lining each street in Broadmead would determine the prevailing height, as defined on page 27 of the Urban Living SPD. Amplified height is defined in the Urban Living SPD as buildings that are modestly higher than the prevailing building height; up to 1.5 x prevailing height in areas of uniform height and up to 2 x prevailing height in areas of varied height. These parameters have not been followed in the ‘prevailing heights framework’ diagram shown on page 21 of the Broadmead Design Code.

There is no justification for proposing building heights greater, and indeed less, than the prevailing height or amplified height. A contextual tall building strategy is required. Tall buildings are defined as anything over ten storeys or 30 metres. Any new tall building should be subject to criteria set out in the Urban Living SPD.

#### 5.3 Stepped massing in corridors

Policy N.13 re building heights on corridors and the associated diagram 12, give guidance without any quantification. The diagrams do not relate to the relationship between street width and building height on either side. No explanation of the V’s in the cross sections is given.

The relationship between street width and building height is the most important aspect of public realm design and creating a comfortable sense of enclosure. As diagram 12 on page 29 and diagram 18 on page 41 shows this can be achieved through 1:1 building height to street width ratio with upper storeys set back to preserve this positive street condition. The cross-section diagrams of the streets should be based on the actual street widths. The heights indicated that correspond to a 1:1 building height to street width. This is in line with policy B14 of the SPD says “Streets should



typically have a 1:1 building height to street width ratio.”

The information on ‘specific massing conditions’ shown on page 65 should be included here.

## S Streets and Spaces

### 5.4 Duplication

Will the Streets and Spaces policies be duplicated in the Broadmead public realm guide?

### 5.5 Tertiary streets

Policy S4 refers to building height to street width ratios on different street types. The 3:1 building height to street width ratio on tertiary routes is too great and will inevitably produce intimidating spaces which will be uncomfortable for the public to use.

The policy on tertiary streets - S13 ‘Tertiary passageways provide calm environments for residents and visitors, including provision for different types of physical activity for all ages.’ - could be made Broadmead-specific. As is clear from the DDP, this is about making use of the courtyards behind the shop buildings, once redeveloped, and this could be mentioned in the design code.

The use of the word ‘passageways’ does not convey this context. And it conveys narrow enclosed alleyways that could end up as mugging and shooting up alleys. The guidance needs to address that safety aspect.

### 5.6 Blue infrastructure

Policy S.1 ‘Existing trees are incorporated into proposals with extensive tree planting and urban greening found on every street, creating an urban forest’ includes ‘Toolkit of design approaches includes: ... SuDS are integrated into the public realm and on-plot as part of a Broadmead-wide water management system. What is proposed here, and are all types of water-based interventions a good thing? Standing water provides mosquito breeding grounds, and is an increasing problem in the UK.

## B Buildings

[As already said, most of the policies are generic and should be in the Urban Living SPD.]

## H Homes

[As already said, all the policies seem generic.]

### 5.7 Recessed front doors

H.1 ‘Front doors to dwellings allow for personalisation within shared corridors and lobbies. Toolkit of design approaches’ includes: ... ‘Staggering and recessing front doors from corridors and galleries’ ...

Could recessed corridor doorways be a security issue – space for muggers to lurk?