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Bristol Civic Society response to the Western Harbour Masterplan consultation

March 2025

1 Introduction

We welcome the opportunity to review and comment on the Western Harbour Masterplan proposals. The Cumberland Basin, now being described as Western Harbour, is the significant entrance to the city from west and it is vital that any the emerging masterplan respects and enhances the historic setting whilst creating a contemporary new area which is fully connected to the adjoining local communities.

Masterplan stage: We understand that consultation at this stage of the masterplan tests opinion on the key elements of the plan before proceeding to the detailed masterplan: it sets out a spatial framework of potential solutions to the major infrastructure requirements and indicates the potential of developable land. We have several questions and comments regarding the proposals, and we hope this consultation helps develop the masterplan in a way that will benefit Bristol and the existing adjacent communities.

The City Council brief: Our comments are addressed to both the masterplanners and the City Council. The area is being treated as part of the City Centre as opposed to an 'inner urban area' (a term used in the Local Plan) , and this is driving inappropriate density of development. We think this is wrong.

The City Council owns over 90% of the land, and it should be demanding a quality development that enhances and protects a unique element of Bristol's character and provides real benefits for the existing community within which it will sit.

The package of investments: We acknowledge where we are in the masterplan development process, but we need to see more about what will be delivered to create a sustainable place. We would like to see more on the following investments:

- Road and bridge repairs/modernization, and evidence that the proposed removal of so many link roads on the south side will provide enough capacity for this strategic route,
- Flood protection scheme
- Plan to protect, repair and celebrate the historic harbour, the heritage assets
- Number of new homes, and a vision of type and tenure, not all apartments
- Target amount of community space worked out in conjunction with the local community but to include a community centre,
- Local services including health care, GP, nurseries and education provision
- Retention and support to Riverside Garden Centre
- Target workspace provision and project developed to deliver this
- Assessment and agreed plan for local shops, market and events space
- Agreed and deliverable public realm/walking /cycling routes especially along the harbour edges.

- Clear delivery plan with choices to be made over costs, and phases of development
- Western Harbour Advisory Group to be basis for a Community Forum that co-creates all aspects of this scheme over time

2 Summary

The Civic Society responded to the consultation in November 2024 – see the [response](#) here. The consultation material now in March 2025 answers some of our questions but not all.

As we said in the November 2024 response: We would also wish to emphasise that this area is a special part of the urban landscape for the whole city, and this is vital to our post-industrial identity as a city-wide community, a visitor experience for people from Henbury as well as Bordeaux. The public space for residents and visitors alike must retain its dock feel, which adds to the experience and sense of emotional connection with the site that we all deserve. Industrial and landscape heritage are two aspects that exemplify this, there are others (eg sport, play, walking, sun rises and sunsets). This area can play so much more of a part in the richness of our city if the various place-making investments (housing infrastructure, heritage etc.) are well framed.

As in our response to the November 2024 consultation, we remain concerned that

- the masterplan does not include a proposal to protect and repair the heritage assets, nor how to celebrate them. Nor is it providing public space for residents and visitors with a dock feel.
- realistic on-the-ground visualizations of views within and across the development are needed, which show the raised flood defences
- delivery and deliverability. The opportunity for community-led delivery, such as a development trust is not being taken up. Without community buy-in, this is likely to feel like a development imposed on the city rather than one developed with the community for local benefit.

Whilst the number of homes to be delivered has come down substantially from that quoted previously, the number of homes needs to be moderated further downwards. We would advocate for gentle densification here with townhouses and apartments from 3 to 5 storeys high. 6/7 storeys is too high and the blocks in the visualizations appear to be too close together.

3 Detailed comments

The following comments are upon each of the consultation boards.

3 - What could be

The 'key features' of the plans are listed as:

- 2.5ha of roads removed and replaced with a single spine road
- Garden centre in a new building at the same location
- Avon Fixed Bridge replaced and Plimsoll Bridge repaired
- Ashton Meadows retained as green open space
- 750 - 1200 new homes no taller than bond warehouses
- c.1,000 new trees planted

We support much of this, but have the following comments:

Road alignment: as we commented on the November 2024 consultation, there are mixed views in

the Society. Some members continue to see this as an opportunity missed. As the 2019 Arup report showed, the argument for other options is that there is an opportunity to create a low-level structure on a different alignment, incorporating a lift-bridge, that is less intrusive. A solution which involved replacing the high level crossing would enable the removal of the unsightly ramps on the Hotwells side and provide more space for housing or leisure uses. While we recognise that the present proposal is probably a done deal, we regret that the masterplanning exercise does not appear to have even investigated such options - certainly it has not presented them to the public. Without further explanation of the alternatives to keeping the Plimsoll Bridge and its alignment, the public does not have full information to understand the options.

We do however support the removal and realignment of roads on the south side of Cumberland Basin in order to improve the area, provided there is evidence of enough strategic road capacity. We are concerned re bus and emergency services routes not just when the bridge swings.

Over-development: The plan does look overdeveloped, the building blocks seem very close together, with the space between blocks no greater than the width of the blocks. The overall need for more housing in the city cannot be ignored, but cramming should be avoided here. This area has a unique character which would be destroyed by too many buildings.

Liveability: There are a few blocks/buildings that seem to be in positions that would make living or working in them difficult and which should be removed or reduced in scale. We comment on specific examples in section 9 below.

Numbers of homes: projected numbers of new homes were quoted in one of the consultation webinars as 750-1200, which is a wide range. We believe that the illustration shows what something in the middle of this range would look like, with variation coming from change in height and mix of accommodation. Whilst even 1200 is much lower than numbers quoted by the Council in previous years, we would argue for something less than that. At the next stage of masterplan development, we would like to see a varied housing offer including town houses incorporating ground floor workspace, stacked maisonettes etc , both to meet the variety of housing need in the city and create a balanced community.

Car-free development: we note that there will be blue badge parking only. Whilst we support the aim of car-free development in principle, it may not be realistic. It is likely to restrict who can live there, reducing diversity. Or residents would keep their cars anyway and parking them in unsuitable places. And as well as the residents, the needs of visitors/deliveries/tradespeople/carers and water-based activities etc needed to be considered. It is noted that there is currently a great deal of on-street parking in this area used by visitors to the Harbour.

4 - Routes

The proposal is to retain the current main traffic routeing, with the exception of times when the Plimsoll Bridge is swung. Capacity modelling (which we understand has yet to be carried out) therefore only needs to take account of the ongoing increase in traffic volumes. Except that if buses use the circular ramp around the rotunda, the traffic on Brunel Way will have to be stopped each time a southbound bus passes through.

We have some comments on various scenarios:

- **Plimsoll Bridge closure:** the key element of this is that northbound traffic would be held stationary during the bridge swing, which would be quicker after the bridge refurbishment. We support the proposals as long as it can be justified by traffic modelling.
- **M5 closure:** what about the impact if the M5 is shut and the bridge swings?
- **Clifton Suspension Bridge:** what about the impact on the Clifton Suspension Bridge when there is a bridge swing and the consequential queuing impact there?

There is of course also the question of delays whilst the Avon Bridge is being replaced.

Traffic flow from Avon Crescent and Cumberland Road: the only way for private motor traffic from Spike Island heading southbound would be to cross over to Hotwells and loop round the north side of Cumberland Basin. This will create more traffic over the Junction Lock Bridge. Cumberland Road will become something of a 'lobster pot'. People visiting the SS Great Britain by car will have to navigate carefully!

5 - Connectivity

We support:

- the better walking and cycling routes
- the proposed wider pavement on Junction Lock Bridge
- the good access for service vehicles, medical and fire service vehicles to the proposed new buildings.

6 - Green spaces and leisure

The planned elements are listed as:

- Heritage district
- Leisure trail
- Flood defence walk
- Other waterside routes

We support incorporating these broad elements into the masterplan. We comment on heritage and flood defences in the sections below. We await a detailed landscape scheme to show the balance between greening, walking routes, activities along the Harbourside, whilst maintaining the dockland character of the area.

We note that the masterplan is so far silent on the historic Sylvia Crowe landscape. Indeed the scheme removes a significant part of the park, We would like to see the vision updated and reflected in the regeneration scheme.

7 - Flood defences and water.

Brunel Lock: Flood defences in this area will be critical to any development here. However, without the visualisations it is hard to support the specific proposal. We support option 1: the desilting of Brunel Lock to reveal the interesting and historic built structures beneath. This can be achieved relatively easily by recommissioning the sluice gate. This worked until about a decade ago and used to keep the whole lock clear of silt.

Views: we repeat a comment that we have made previously. An important aspect is the impact of any development on specific views, and we think it would be helpful to provide visualizations of key views and how those views should be protected. For example, the raised defences at the Knuckle and new defensive walls from there around Brunel's Lock and into the New Cut would have a significant impact on the iconic view towards the Suspension Bridge. It is important that the masterplan shows the impact of flood defences on specific views within, across and through the area. We understand that the defences may be as much as 1.5m high. At some points these will be very intrusive. It is important that the masterplan includes realistic on-the-ground visualizations and include walk-through videos'

Relationship between the heritage railway line and the flood defences: The heritage railway line (and the chocolate path) is outside the newly built flood defence wall on Cumberland Road, so the route of the railway needs to remain on the outer side of the new flood defence wall and run between the new buildings and the river. The associated platform could become part of the flood defence wall.

8 – Heritage

Conservation Areas. - This is a hugely historic part of the City, where the Avon Gorge meets the end of the floating harbour. The site is located within two conservation areas: the Clifton and Hotwells Conservation area and the City Docks Conservation area. These reflect the significant historic character of this area. Any development would have to be tested to ensure it does not have a negative affect on these two conservation areas.

Lack of commitment and lack of detail: “The masterplan sets out a menu of opportunities to restore or repurpose these assets in projects that can be taken forward more or less independently as funds and champions emerge.” We support the repair/refurbishment of such assets. The masterplan describes them as opportunities, but it would be good if it could express firm commitment. And the ‘Heritage district’ is not explained, other than as an area linking up a number of artefacts. A masterplan should say more than that.

In particular, more should be made of the two Brunel bridges. They are part of the ‘Bristol brand’, and should be central features, proudly presented. They are more than ‘opportunities’: they are ‘core to the whole area’. Rather than being ‘subject to funding and champions’, they are a statutory obligation of the Council and the Council should be championing them.

Restoration work needs to be done now, otherwise the heritage assets, eg the silted-up Brunel Lock and the Brunel swivel bridge, would be lost forever. If not now, there should be firm delivery plans.

Listed warehouses – A Bond, B Bond, C Bond: we note the history and design of these bonds and hope we can explore with the City Council alternative creative schemes to fully use these buildings. and enable public access. We also support retaining public heritage archives in one of the warehouses. However, we understand converting the warehouses to residential use may be problematic. Guidance from English Heritage should be fully reflected in the masterplan. It may be that these buildings are better with a mix of uses including community centre, cultural projects, start-up business units, creative workshops and warehousing.

Avon Crescent substation – we support the proposal to re-purpose this as a cultural venue. However, it may not be large enough (unless an extension is added at the rear), and as an alternative small business use could be compatible.

Use of Brunel's old bridge: the proposals seek to make use of Brunel's old bridge at a raised level as part of the raised flood defence wall (as per note 10 on board 3). (This however does not feature in the illustration of Option1 on Board 7.) As part of the future masterplan development, we ask whether this is consistent with the bridge's grade II* listing.

9 - Mix of uses.

We seek a medium-rise development, with no development taller than the bonded warehouses, with ground floor activation, and investment in enhanced community facilities. We would like to see a variety of size of homes, type and tenure.

Lack of detail: We support a mix of uses and active ground floor uses. At this stage of masterplan development, the proposals are vague on where workspaces would go and the quantity required and for the desired housing mix.

Building heights: It is confusing to suggest that the warehouse floor-to-floors are equivalent to the floor to floor heights of new residential properties, as they are substantially lower. Therefore we would suggest that the heights of the new proposed buildings be reduced overall to ensure they are at least two storeys lower than the the heights of the bonded warehouses so that they remain the dominant built form.

The predominant existing height of buildings in the area is from 2/3 storey to maximum 5-storey houses, the bonds being a much-loved exception. 6/7 storeys across the whole site is too high. We support 5/6 storey maximum. We need a mix of houses and apartments to meet proven need and to keep these in the range of 3-5 storeys.

Spike Island: the array of nine 7-storey blocks, 16 metres apart and 23 metres high, are too much. The spaces between the blocks will feel canyon-like. They would need to be at least 23m apart to feel comfortable. A row of finger blocks is not the only possible solution. A viable alternative if heights were reduced would be perimeter blocks around an inner space.

Development of the land at Riverside: to pursue this part of the scheme would have a massive impact on the Riverside business which would effectively have to move twice, and endure three years of construction activity. If flats are to be built here, the buildings should be considerably lower so the top floors of C Bond can be seen above them from the proposed square adjacent to A Bond.

The "eyebrow" housing blocks: the residential flats would need to be single-aspect with substantial sound-proofing and air quality measures to enable them to be habitable, this making them very expensive to construct. They would also require deck-access. We should not build such residential development. The 7-storey buildings would overshadow the existing buildings nearby, and adversely affect the view from the south side of the basin towards the houses in Clifton/Cliftonwood on the escarpment behind.

The 7-storey building by the Junction Lock Bridge: this isolated block on a small parcel of land

does not seem very practical - difficult to access/service. The bridge swings across half of the area.

The rotunda: there are mixed views. Some favour leaving the site empty; others would be happy to see a “statement” building or tall structure there. It does not seem a good site for residential accommodation: even though the ramp around it would normally be closed to traffic, it is very close to the elevated four-lane highway. Potentially an elegant building, at c.25m diameter it is not a very conducive shape for flats and maybe it would be better as a hotel with a restaurant on top taking advantage of the iconic view towards the suspension bridge.

Community, cultural and business space: More work needs to be done to understand local capacity and ambition for community space, the ambition and deliverability of any cultural space and any community/business-led workspace project. This would then help to inform location/co-location and whether it is better to have these activities distributed across the whole site or rather concentrated say around the two bonded warehouses and immediate space there.

This is an opportunity to improve facilities for the existing local community as well as support this particular development. It is not the ‘City Centre’ and the intention should be to provide a local hub which respects the dockland character and the existing communities. This could be located in one of the tobacco bonds, for example updating the CREATE Centre space

10/11/12 - Townscape and homes / what it might look like.

The sketches look interesting and the overall concept a good one in many respects. Modifications to both the location and heights of the buildings would protect views from the public spaces of both towers of the Clifton Suspension Bridge, and reduce the dominance of the new buildings on the Underfall Yard.