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Bristol Civic Society response to St Philips Marsh SPD consultation round 2

1 Introduction

The Society welcomes the opportunity to comment on the draft SPD masterplan. We commented on the aspects of the SPD presented in the first consultation in August 2025.

We think that the SPD is on the right lines.

Our main remaining concerns are:

- delivering a high-density area gives rise to tensions between different land uses, for instance liveable housing, open space, local centres, car parking. Is the SPD as clear as it could be to help ensure the optimum balance?
- we agree that dense development is appropriate in this regeneration area, but it is not clear that it is realistic to achieve the proposed density of housing alongside the requirements for open space, a school, and local centres. There needs to be a clearer demonstration of this.
- no maximum is set in the SPD for building height. We are concerned that without planning guidance the focus on high-rise buildings will be excessive. High density should be possible without a plethora of high-rise buildings. A Design Code for the area is needed.
- we cannot see that the main open space will be large enough for the increased population in this area, let alone surrounding areas too.
- business intensification has not been delivered in many places nationally, and the concept has yet to be fully proved to work.
- in principle we support the low-traffic approach, with bus gates and low levels of car parking, but this is a big change from the current situation. We do not see how a St Philips SPD can commit to anything transport-wise without a more detailed study, which must include consultation with Council highway designers.
- the objectives seem right, but we wonder what the area’s unique identity will be.

2 General comments

We said in the [BCS response](#) to the August 2025 consultation that the masterplan should include a number of items. The table below reviews whether this information is included in the draft SPD in the current consultation. A number of our suggestions have not been acted upon, and we would encourage a second review of whether more should be included.

We said the masterplan should include ...	Is it in the current draft SPD?
Strategic background that has informed the SPD. Spatial and strategic planning context.	The commentary on <i>Policy DS3: St Philip’s Marsh</i> in the emerging Local Plan, explains the strategic background better than the SPD does. At a policy level, several SPD policies cross-refer to relevant Local Plan (2026) policies.
The relationship of St Philip’s Marsh (StPM) to the wider city and adjoining	No, except to the extent that movement routes allow for connections to the wider city.

The Five Guiding Principles
Integrated and Connected
Inclusive Economic Growth
Creative and Vibrant Communities
Quality Open Spaces
Brilliant Buildings

... four ambitions:

A new mixed-use district in the heart of Bristol
A unique and inclusive place for learning, working, living and growing
A place for people
A climate-resilient neighbourhood

BCS comments:

- the Principles and ambitions seem right, but we wonder what the area's unique identity will be. Is there anything in the Principles and ambitions that reflects the unique identity of the area: could they be applied to any urban regeneration area in the country? For instance, there is no reference to celebrating the history of St Philips Marsh.

4. Development framework

Framework plan

"The key moves include:

01 Leverage green and blue assets within St Philip's Marsh to establish the waterfront as a primary destination while protecting the site from flood risk.

02 Establish land use areas that respond to surroundings and support successful and well-connected communities.

03 Strengthen St Philip's Marsh's connections by establishing a network of green corridors.

04 Distribute a range of open spaces to create easily accessible and inclusive areas for play, recreation, and relaxation."

"The Illustrative Masterplan (in page 10 of this Digital Hub) sets out one way in which the Framework Plan can be delivered. Each planning application coming forward within the SPD area should consider the Illustrative Masterplan, should demonstrate how comprehensive development will not be fettered by the proposals coming forward, and how the future development context has been considered."

BCS comments:

- it would have been helpful as context for the way the area will evolve to have a breakdown of existing character, broad land-use categories and public/private ownership patterns.

- it feels unhelpful to users of the SPD that it ignores recent permitted developments. Whilst the SPD should be a forward-looking document, it would be helpful to the public if the current status of permitted developments was easily available - if not in the SPD itself, via a link to information elsewhere.

5. Land uses

“The principles related to land use indicate which areas are suitable for housing, employment, mixed-use, a new primary school, and District or Local Centres. They also explain what is expected for each type of development.”

Policies:

Employment (SPM 02)

Housing (SPM 03)

Purpose Built Student Accommodation (SPM 04)

Infrastructure Safeguarding (SPM 05)

Social infrastructure and community facilities (SPM 06) & Education (SPM 07)

District and Local Centre Uses (SPM 08)

Cultural and Meanwhile Uses (SPM 09)

Comments:

- we note the overlapping areas of search for eg housing, open space, school, local centres. Whilst flexibility is realistic, it begs the question of how it is ensured that there is adequate provision for each use overall.
- is there enough detail on housing mix? eg sheltered housing
- quantum of student housing: we note that no maximum is stated, as the Local Plan’s Inspectors have ruled out any maximum on student accommodation. However, is it not possible to add some wording that indicates that there is some limit on the amount of new student accommodation? Especially as market forces have already led to so much PBSA permitted development. Could the SPD not at least expand on the reference to Policy H7 of the Local Plan 2026 to say that that policy is about how “the amount and location of purpose-built student accommodation will be carefully managed”?
- should there be reference to ground conditions in certain areas which could have structural/environmental implications for the type and scale of future development? For instance, the Fruit Market is on made ground dating from the late 19th century.
- retention of some businesses in the area is important, with a local workforce, alongside new purpose-built workspaces. The SPD acknowledges this - “*The Council recognises the value of existing businesses and will support the retention and/or re-consolidation of existing business in the area.*” Retention of existing businesses is made more difficult by the market pressure of residential land values in areas of low-rent industrial space. Finding affordable, workable locations elsewhere for businesses that move out may not be easy. It is a tricky balance to strike.
- is there enough on how business intensification would work? It has not been delivered in many places nationally, and the concept has yet to be fully proved to work.
- should provision of workplaces be measured in numbers employed rather than employment space?
- we note and welcome the guidance for Infrastructure Safeguarding (SPM 05) on the long-term adaptability of the masterplan if changes are made to the railway line/depot.

Survey questions:

1. *To what degree do you think the principles for land uses support the vision for St Philip’s Marsh? [multiple choice Q]*

Strongly agree, partly agree, neither agree nor disagree, partly disagree, strongly disagree.

2. *How well do the draft principles support the vision of St Philip’s Marsh as a mixed-use district,*

and what more could they do to support the delivery of a mix of housing options, local employment and places for people to come together?

3. What local or area-specific challenges could be better addressed by the principles to ensure homes, jobs and community facilities are delivered?

6. Character areas

Policies:

Character areas (SPM 23)

In line with Policies DS2 and DS3 of the Bristol Local Plan (2026), St Philip's Marsh comprises six distinct character areas including: ...

Development coming forward within the relevant character area will be required to respond to the character-area specific guidance, alongside the relevant extract from the Local Plan.

Heritage (SPM 13)

Planning applications within the SPD boundary will be expected to consider the existing heritage assets on site.

BCS comments:

- the SPM 13 verb is "consider", which is weak. The consultation NPPF's policy *HE4: Securing the conservation and enhancement of heritage assets* is stronger. The SPD wording needs reviewing.
- do the sections on Character Areas do enough to explain the 'Place' qualities - existing, supported or proposed?
- Local Listed heritage assets include two bridges, which are not obvious on the map: 1) Sparke Evans Bridge, and 2) Albert Road rail bridge, with its useful pedestrian link over the river Avon to Totterdown.
- there is very little comment on topography of the area apart from mention of the elevated area of the former Fruit Market.
- this section should say something about views across the StPM area - particularly from elevated positions to the south and east.

Survey questions:

4. To what degree do you think the principles for character areas support the vision for St Philip's Marsh? [multiple choice Q]

5. What additional detail or clarity, if any, would help make the character area principle more effective? Why?

7. Green and blue infrastructure

Policies:

Green and blue infrastructure (SPM 10), (SPM 11), (SPM 12)

Access to Water Edge (SPM 14)

Interaction with Avon Riversides 2100 – formerly Bristol Avon Flood Strategy (SPM 15)

BCS comments:

- the emerging Local Plan and the Parks and Green Spaces Strategy forecast a sharp decline in the already inadequate open space per person available in central and inner Bristol. St Philip's Marsh is one of only two areas identified where open space may increase. We cannot see that this will be on a sufficient scale even to meet the needs of the area itself.

There needs to be somewhere big enough to play ball games and run, not just a tree-filled haven for sitting and strolling as suggested in the artist's impression. Fine to suggest an open space may be located next to a primary school but it needs to be much bigger if it is to meet the needs of active children, both from there and further away

- we note the phrase "area of search" in the Development framework diagram. Whilst flexibility is realistic, it begs the question of how it is ensured that there is adequate provision.

Survey questions:

6. *To what degree do you think the principles for green and blue infrastructure support the vision for St Philip's Marsh? [multiple choice Q]*

7. *What more could the principles do to support the creation of parks and green spaces that support nature, recreation and everyday life?*

8. *How can the SPD better support connected parks and waterside spaces along the River Avon and Feeder Canal?*

8. Density and heights

Policies:

Density (SPM 19)

Residential development will be required to meet the minimum requirement of 200 dwellings per hectare in line with the Bristol Local Plan (2026) unless it is demonstrated that lower density development is necessary to safeguard assets and character of the area.

Heights, massing and key views (SPM 20)

All development will be required to ensure variety and dynamic skylines in line with the relevant character area.

Landmark buildings at key locations, such as gateways, main street junctions and adjacent to principal open spaces, will be supported.

Guidance:

...

Tall buildings are defined as those of 30 metres or more (equivalent to 10 storeys), in line with Policy DC2 of the Bristol Local Plan (2026), and, subject to appropriate design and setting. They will be considered acceptable in the locations identified in the diagram below.

...

Strategic placement of landmark buildings at key nodes, such as gateways, main street junctions and adjacent to principle open spaces, will be supported which provide essential wayfinding. All development must be proportionate in scale to the width of streets and public spaces, and consider impacts on residential amenity. Stepped massing will be encouraged which respects the street scene.

Development for tall buildings will be expected to consider their impact on the significance of nearby heritage assets and their setting, along with impact on retained buildings within the SPD boundary.

All development must also consider key views through out the site.

Roof Treatment (SPM 21)
Daylight, Sunlight and Microclimate (SPM 22)

BCS comments:

- as a general principle we agree that dense development is appropriate in this regeneration area.
- however, it is not clear that it is realistic to achieve such density of housing alongside the requirements for open space, a school, and local centres. There needs to be a clearer demonstration of this.
- we note that no maximum is set for building height, nor density. We understand this is largely because it is thought not possible to withstand challenge in the planning process. This seems a weak approach to setting planning policy. We are concerned that without planning guidance the focus on high-rise buildings will be excessive, and even that developments will be approved that bear no relation to the SPD's vision. High density should be possible without a plethora of high-rise buildings. A Design Code for the area is needed.
- we note and support the requirement in the guidance to SPM 20 that "*All development must be proportionate in scale to the width of streets and public spaces ...*". It is this that should help to ensure that building heights are not excessive. However, it is too vague unless it prescribes an appropriate ratio.
- we note also the requirement in the guidance to SPM 20 that "*Strategic placement of landmark buildings at key nodes, such as gateways, main street junctions and adjacent to principle open spaces, will be supported which provide essential wayfinding.*". Does that override the requirement that development should be proportionate in scale? The SPD should be clearer on this point.
- we note: "*SPM 19: Residential development should be delivered in line with the minimum requirement of 200 dwellings per hectare set out in Policy UL2 of the Bristol Local Plan (2026)* ", and we note the map showing locations with potential for >200dph. Should the SPD explain how this principle works together with the other principles in the guidance to SPM 20 (quoted above). in order to provide coherent guidance for developers??
- the illustrations in the Illustrative Masterplan do not seem to show any blocks less than four storeys. Is there any scope for conventional houses with gardens?

Survey questions:

9. *To what degree do you think the principles for density, heights, roof treatment and microclimate support the vision for St Philip's Marsh? [multiple choice Q]*

10. *What additional detail or clarity, if any, would help make the density, heights, roof treatment, and microclimate principles more effective? Why?*

9. Access and movement

Policies:

Movement Strategy (SPM 16)

Guidance:

St Philip's Marsh is expected to be a low-traffic, walkable neighbourhood where vehicular movement is minimised, and pedestrians and cyclists are prioritised through the movement network.

All development within the SPD area must deliver a comprehensive, legible and well-defined movement network which enables local movement routes and integrates with existing routes

outside of the SPD boundary where possible.

...

To inform the development of this SPD, work is underway to explore options for a dedicated access route that could serve industrial uses in North East St Philip's Marsh, whilst minimising impact on residential areas.

...

Transformation of Feeder Promenade, Albert Road/ Victoria Street and Riverside

The Feeder Promenade is a pedestrian-priority route that anchors the district centre, creating a vibrant waterside destination along the Feeder Canal. This promenade establishes St Philip's Marsh's primary retail and leisure frontage, combining active ground floor uses with generous public realm.

Riverside: The River Avon Walk along the southern boundary represents both a significant opportunity and defining feature for St Philip's Marsh. Currently a narrow footpath with blank building façades backing onto it, the corridor is transformed into an ecological river walk that serves as Bristol's primary east-west green corridor

Strategic and Public Transport (SPM 17)

The SPD will require an efficient bus network through St Philip's Marsh, ... to ensure all residents and workers can access a bus stop within a 5-minute walk.

The introduction of bus gates in St Philip's Marsh, such as on Totterdown Bridge and Avon Street, will be supported, subject to it being demonstrated that they do not adversely affect the wider transport network.

Parking (SPM 18)

All development within the SPD boundary must comply with the car parking, accessible parking, EV charging and cycle parking standards set out in Policy T4A of the Bristol Local Plan (2026) and relevant guidance.

Given the SPD's central location and existing connectivity, low levels of car parking provision will be supported. ...

BCS comments:

- in principle we support the low-traffic approach, with bus gates and low levels of car parking. We note that the benefit of the bus gates is that they:

- enable free passage for buses, which makes services quicker and more reliable, which encourages passenger use, which facilitates greater bus frequency.
- prevent existing rat-runs on Avon Street and Totterdown Bridge
- help to create a quieter and safer street environment for residents and workers.

But this is a big change from the current situation. It requires a detailed feasibility study: will this be completed in time for the publication of the SPD?

We have the precedent of the City Centre Development and Delivery Plan, which projected Nelson Street as a green pedestrian boulevard, but when the detailed design work of the City Centre Transport scheme was done, it morphed into a bus-dominated corridor. We do not see how a St Philips SPD can commit to anything transport-wise without a more detailed study, which must include consultation with Council highway designers.

- we note the options presented for the access route serving industrial uses in the North East area, and that further work is being done on them. We note that they all involve the substantial work of either lowering the road or building a bridge in order to cross under or over the railway line.

- although “low levels of car parking provision will be supported”, the minimum parking levels prescribed in the Local Plan will have to met. But the Local Plan defers setting standards to a yet-to-be-published Transport SPD. The level of parking space that can be accommodated in an area to be developed as densely as St Philips Marsh is low, but certain categories in the large new population will need a car. The SPD draft wording seems vague, and there is no indication of where on-street parking will be allowed. It will be a big change from the current situation where there is widespread on-street parking. It will be a difficult balance. Is it possible to add further guidance?
- as others have commented, Chapel Street may be too narrow for buses. Stanhope Road/ Camwall Road may work better
- to increase connectivity to outside the area, we would support a second cycle / pedestrian bridge from the southern end of Albert Crescent across to the Paintworks, and beyond to Arnos Vale and the Wells Road. (We think this was included in an earlier plan?)

Survey questions:

11. *To what degree do you think the principles for movement and transport support the vision for St Philip’s Marsh? [multiple choice Q]*

12. *What more could the principles do to make walking, cycling and public transport the easiest and most attractive ways to get around?*

10. Illustrative Masterplan (as one potential outcome)

Framework Plan (SPM 24)

The illustrative masterplan below sets out a potential approach for delivering the regeneration of St Philip’s Marsh while meeting the absolute requirements outlined in the SPD.

The map below is interactive. ... Please note that these visuals represent only one possible outcome and are intended to illustrate the potential character of a transformed St Philip’s Marsh.

BCS comments:

- although there are plans showing notional areas for denser development, it would be helpful if the scale of the illustrative blocks was indicated, either by suggested storey heights - or at least some proportionate shadow mapping.

11. Phasing and infrastructure

Phasing

Infrastructure schedule (SPM 24)

... The SPD will set out a list of infrastructure requirements for development to contribute to and/or facilitate the delivery.

BCS comments;

- this section has a welcome degree of detail on infrastructure requirements and development phasing