



an independent force for a **better Bristol**

### **Bristol Civic Society response to St Philips Marsh masterplan consultation round 3**

#### **1 Introduction**

The Society welcomes the opportunity to comment on the final draft masterplan before it goes to Committee in September 2026. We commented on the aspects of the masterplan presented in the first consultation in August 2025 and the second in February 2026.

The St Philips Marsh area is a key part of the Bristol Temple Quarter LLP delivery area. BTQ is committed to deliver meaningful place -based change for local people and yet this draft masterplan is weak on connectivity to the City Centre, to adjoining areas and communities such as Totterdown and for setting out a clear vision of a great new neighbourhood. There are not enough parameters in the masterplan to ensure that the key ingredients of a great new neighbourhood will be delivered. A great new place needs a strong mix of housing type and tenure, good connectivity, both within the area and with surrounding areas including walking and cycling routes; and adequate and accessible green and blue infrastructure. We accept that dense development is appropriate in St Philips Marsh, but only up to a certain level of density and if it is done in the right way. The suggested density of development is too high and risks yet more tall buildings which are not appropriate on this area. The amount of open space is too small.

This is an opportunity to plan a medium-rise neighbourhood of up to say 12-storey mixed-use housing and employment area to create a great new place. The bubble has burst on student housing; controls need to be put in place to ensure new homes, new solutions to medium-rise block including stacked homes and mansion type blocks typically seen in London but not part of the usual housing offer in Bristol. Likewise, the masterplan needs to be realistic about timescales and deliverability since we are told that the area is in multiple ownerships and at the present time land values are favouring retention of the long-established employment land uses.

The Civic Society notes the evolution of the masterplan but we still have some major concerns, most of which we have voiced before, that the opportunity to adopt a clear long-term vision for an exemplary new neighbourhood is not being promoted

We think that the masterplan continues to be on the right lines in many ways, but we still have some major concerns, most of which we have voiced before. We trust that our comments are seen as constructive. We are motivated only by our passion for wanting the best for Bristol and its people.

#### **2 The main points (mostly re 07 Design Guidance)**

##### *Too squeezed?*

What is proposed for the area can seem to be squeezing a quart into a pint pot, and we think the area may feel over-dense once built. The total area is 95 hectares (04.01). The masterplan aims to deliver more than 7000 homes (04.05) south of the Feeder, which equates to  $7,000 \times 2.4 = 16,800$  people; 150,000sqm of employment space (some stacked) (06.02); 10.5ha of 'parks, gardens etc'.

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The statement “*Key Objectives: Successful proposals will: ... – Provide a mix of types, sizes and tenures of homes to meet local needs*” will not be achieved with a minimum density of 200dph across the whole area, and without a target minimum level of family accommodation. The current plan will deliver some unstated amount of family accommodation, but that will be almost entirely in flats, not town houses.

## 07 Design Guidance

A ferry stop is proposed on the north side of the canal. Will that be accessible from the south of the canal via the proposed footbridge across the canal? There could be a ferry stop on the south side, with direct access to the local centre at Feeder Square,

Would it help if the maps in these sections showed which streets will be newly created? eg the eastern half of Stanhope Street, and the active travel route called Albert Gardens.

We agree with the key objectives, which are mostly aimed at keeping the numbers of motor vehicles low, but the planned provision for parking remains vague and with no metrics.

*On-street parking will be reserved for accessible spaces and essential servicing, protecting kerbside space for green infrastructure and active travel. Car clubs will be supported.*

We acknowledge that it is a tricky balance between the aim of a low-car neighbourhood and the realistic needs of eg taxis, delivery vehicles, services, and carers. Without any sort of management strategy for on-street parking, the scourge of parking on pavements, and even buildouts, will apply.

The Local Plan defers setting parking standards to a yet-to-be-published Transport masterplan, so does not help set policy here.

We understand that some road widths will be re-planned as developments come forward, to accommodate walk/cycle routes. We could find this widening only for Chapel Street in the masterplan. Presumably the river path plans will require some building lines to be pushed back?

Are there other examples? It would be helpful to make this clear, and show all the widenings on one of the maps.

#### *Chapel Street*

Is it feasible to widen the western end of Chapel Street, given the Jubilee Hall listed building on one corner, and the former Fox pub only 9m opposite wall to wall? In Fig 07.15 Section A, the minimum road width is 20.8m. A number of other buildings on Chapel Street will need to be demolished in order to achieve that road width.

### 07.08 Street Hierarchy and Typology

#### *New streets*

Would it help if the map in *Fig 07.31 Illustrative street network and hierarchy* showed which streets are being newly created, eg the eastern half of Stanhope Street, and the active travel route called Albert Gardens?

### 07.09 Green and Blue Infrastructure Strategy

#### *Walkways and cycleways are not recreational open space.*

The River Avon Walk and the Victoria Road linear park look excellent for walking, cycling and relaxing. But these linear routes should be seen as part of the public realm, not recreational open space, suitable for say a family ball game, or walking a dog off-lead. The River Avon Walk will be less than 20 metres wide in places. Most of the 20 metres, where it exists, will be taken up with a 4 metre cycleway, wide walkways and landscaping. We do not accept the statement in section 7.09 that 11.9ha of open space is provided through the green corridors of promenades, fully pedestrianised streets, ecological buffers and the new riverside landscape.

#### *Inclusion of metrics*

The masterplan's guidance will not succeed in its aims unless it includes metrics that guide the required development, for instance the size and location of parks. Without metrics, negotiation with developers of individual sites faced with the conflicting pressures on achieving target numbers in a confined space will dilute the plan's aims.

#### *'Areas of search'*

An illustration in the masterplan - *Fig 07.35 Area of search for new public realm and public realm improvements within St Philip's Marsh* - shows that the locations of Chapel Park and Fruit Market Park are not fixed. The areas of search for them (and the primary school) are quite large. The only commitment on size is that both parks will have at least 50 metres on one dimension. With no other dimension specified, these parks could be infinitesimally small.

#### *The need for recreational open space*

Section 2.06 of the draft explains how little open space there currently is in the area or anywhere near it. Sparke Evans Park is the only significant public open space. The nearest large parks to St Philip's Marsh are Netham Park, Victoria Park and Arno's Court Park. These are all at least a twenty-minute walk away.

There is little open space within Bristol's central areas as a whole. According to the Local Plan there was 12.02 sq. metres per person in 2023. Population increases would bring this down to 7.28sq metres per person by 2039. The plan suggested an additional 2.9 hectares could be found

in St Philip's Marsh and two other areas, giving a target local plan figure of 7.75 sq. metres per person. This is below the WHO recommended minimum standard of 9 sq metres per person. Other cities are more ambitious. Birmingham expects every development of more than twenty dwellings to provide 20 sq metres of open space per person. Nottingham expects 24 sq metres, in line with the city average. The Local Plan target for Bristol as a whole is 29.25 sq. metres per person (there is currently 33.37 sq. metres per person).

*The park space is too small*

The Masterplan says: "*The Illustrative Masterplan provides 10.5ha of recreational open space, each more than 20m wide in one direction, comprising the new parklands, community gardens and public squares together with the regenerated Sparke Evans Park.*"

There are three problems with this statement:

- even as illustrated, some of these areas are too small to qualify as public open space by the Council's own definition (see below)
- the proposals are only illustrative. Chapel Park and Fruit Market Park may not be where they are shown in the illustrations and may be considerably smaller.
- there is no large open space proposed.

The two new proposed parks, Chapel Park and Fruit Market Park should be compared with similar open spaces familiar to Bristolians: Queen Square and College Green, which have useable recreational areas of 1.7ha and 1.1ha respectively. Both proposed parks are less than half the size of College Green.

Sparke Evans Park will continue to be the only significant open space in the area. Estimates of its size vary from 2.3 to 2.9 hectares. The proposals to regenerate the park are welcome, particularly the emphasis on communal facilities such as a bandstand and football fields. But the illustrations show that these are likely to cover only a small part of the park. Even if the whole area were available for recreation, it would still not count as a large park, even by the standards of inner Bristol. As section 2.6 explains, Victoria Park covers 21.3 ha., Netham Park 15.4 ha and Arno's Court Park 7.1 ha. St Philip's Marsh should have a large park too. This would serve not only its own residents, students and office workers but also those in the rapidly developing other parts of central Bristol.

The LLP's stance on this (as per 'You Said, We Did' consultation feedback) is that, *There have been different views on the size of parks, with some access groups saying they would prefer smaller spaces which feel safer.* We would respond that that is an argument for a mix of spaces; it is not an argument for not having a large park.

The park space is not adequate. We suspect the the LLP realises this, when it admits that .. *A large park would not enable the quantity of housing and business in the area.*

*Minimum size of an open space for recreation (Council definition)*

Council officers' advice on the Parks and Green Spaces Strategy set a minimum size for open space for recreation of "0.2 hectares (about the size of a mini football pitch) with no dimension being smaller than 20m. This approach avoids a proliferation of small amenity spaces or public realm improvements which have limited recreational function. A space of 0.2 hectares has more potential to offer multifunctional use, to support ecology if providing for nature is the primary function, and to respond to the need for urban parks to promote mental and physical health." The masterplan's inclusion of spaces more than 20 metres wide in only one direction falls well short of this.

#### 07.09.01 Green corridors

We welcome the proposals:

- to make the most of the river and canal;
- to provide wide cycling and pedestrian routes; and
- to create a 25 % tree canopy

#### 07.09.03 Feeder Promenade and Square

##### *Misleading artist's impression*

The artist's impression *07.41 Feeder Square and Promenade on a weekend morning* shows little shade, but this is based on the sun shining from the north. In real life the Square will be shadier.

#### 07.09.05 Fruit Market Park

##### *Misleading artist's impression*

The illustration makes the park look larger than it is, and it is likely on a steep slope. The illustration shows the sun shining from the north.

##### *Tall buildings on the edge of the park*

The wording on 7.12 says "tall buildings are minimised on Fruit Market Park". But the illustration shows two 12-storey buildings, and one 14-storey, all three on the edge of the park? These will reduce the sunlight in the park.

#### 07.11 Heritage

##### *Strength of the key objective*

There is one objective in this section: - *Key Objectives - Successful proposals will: Consider the existing heritage assets within and in proximity to St Philip's Marsh, including those identified in Fig 07.49.* The verb "consider" should be strengthened. The draft revised NPPF's policy HE4: Securing the conservation and enhancement of heritage assets is stronger. The masterplan wording needs reviewing.

#### 07.12 Heights, massing and key views

##### *Inclusion of metrics*

The masterplan's guidance will not succeed in its aims unless it includes metrics that guide the required development, including maximum height and the ratio of building height to street width. Without metrics, negotiation with developers of individual sites faced with the conflicting pressures on achieving target numbers in a confined space will dilute the plan's aims.

##### *Likely metrics without maxima in the Masterplan*

- The likely heights of the tallest buildings are not quoted in the wording, but the illustrations imply about 15 storeys. With no maximum metric in the masterplan, it is likely to be higher.
- Building heights should not be more than the width of the street. With no maximum metric in the masterplan, the ratio is likely to be higher. Developers are already probing this with a 30-storey pre-app in the masterplan area.
- *Fig 07.54 Areas showing potential for tall building in relation to key gateways, junctions, open spaces and views* shows the locations as blobs that are acceptable for tall buildings. Without hard boundary definitions in the masterplan, the area for tall buildings are likely to be wider.

### *Key views*

*Fig 02.09 Existing heritage assets plan and key views*, does not consider views from outside the area, especially from the south – Totterdown and Paintworks. Proposals for tall buildings must consider such views.

### *Two ways of showing density/height across the area*

The visualisations of layout of blocks and building mix and layout help the reader understand how the proposed density might be realised and are welcome, but the density heat map that was used in the February consultation was also helpful in a different way, and both could be included in the document.

### *Building mix*

The southern half of the area should be treated as a zone of transition from the city centre to the nearby suburbs, such as Totterdown. The minimum density for the southern half of the area should be reduced, and the mix of housing should include a significant proportion of family housing, particularly town houses rather than family accommodation in flats.

### *The need for tall buildings*

It could be that tall buildings are not needed to achieve the target number of dwellings. A member of the Society has calculated that all the envisaged 7,000 dwellings can be accommodated in buildings no higher than 7 storeys.

### *Tall buildings near green space*

On page 347, Fig 07.55 cites views from apartments in a tall building as a reason for siting tall buildings near open space or blue or green infrastructure, and Fig.054 suggests sites where this could be implemented. But tall buildings edging a park will feel overbearing for those in the park, and will make the outdoor space gloomy, cold and uninviting.

### *Terminology*

- We understand that 'townhouses' refer to 3- or 4-storey terraced housing. They could be described that way to make it clear.
- 'Mansion house' is not a widely used term in Bristol. 'Blocks of flats between 4 and 10 storeys' is a more readily understood way of describing what is proposed. (In practice no blocks are likely to be built between 7 and 12 storeys, due to the need to include additional staircases and lifts in buildings with floors above 18 metres, in line with the Building Safety Act.)
- Likewise, we are not sure that 'mews house' is self-explanatory. What differentiates a 'mews house' from other 'town houses'?

### *The block illustrations*

- The illustrations of townhouses show blocks with no vertical lines to indicate their terraced nature, which may mislead some people.
- The wording says "tall buildings are minimised on Fruit Market Park". But the illustration shows two 12-storey buildings, and one 14-storey, all three on the edge of the park?

## 07.13 Density

### *Maximum density*

The masterplan's guidance will not succeed in its aims unless it includes metrics that guide the required development, including maximum density. Without metrics, negotiation with developers of individual sites faced with the conflicting pressures on achieving target numbers in a confined

space will dilute the plan's aims.

#### *The southern half*

The southern half of the area, south of the railway line, should be treated as a zone of transition to from the city centre to the nearby suburbs, such as Totterdown. The target number of dwellings south of the Feeder should be reduced from 7000, with a reduced density.

#### *Images illustrating density*

We suggest some better images should be found for *Fig 07.57 Precedents for density strategy*.

#### *Order of the Density section and the Height + Massing section*

The section on Density has more on building typology than on density, and could be renamed to indicate this. It would work better as an introduction to the section on Height and Massing. The section on Density could be moved to be before the section on Height and Massing, or merged into it.

## 08 Delivery and infrastructure

### Parks and linear parks

We are concerned that the new recreational open space will not be implemented for a long time, if at all. The masterplan expects the area to be developed slowly, over decades. It recognises the need to phase in infrastructure, but recreational open space has not been made a priority. Only the Victoria Road linear park is in Phase 1, and part of the River Avon Walk in Phase 2, with the rest in Phase 3. (As we have argued earlier, these should anyway be classified as public realm improvements, not recreational open space). The Fruit Market Community Park and Sparke Evans Park improvements are also in Phase 3. The recreational Chapel Park is in Phase 4. Short-term transformation of even the public realm seems unlikely. It is not clear when trees will be planted, nor how long they will take to grow. They are all mature in the pictures.

To add to the uncertainty, all these proposals depend on contributions from developers.

### New N/S pedestrian route

The new N/S pedestrian route will be a very important link between the areas north and south of the railway line. It is not prioritised in the delivery phasing, and will require a long new tunnel under the railway so will be costly to deliver, and possibly a long period of negotiation with Network Rail. Can the masterplan give more confidence that it is a priority and is deliverable, and indicate when that might be?