## <u>Bristol Business Improvement Districts – Bristol City Centre BID, Redcliffe &</u> <u>Temple BID and Broadmead BID – Local Plan Review Representation</u>

#### January 2024

#### What is a Business Improvement District (BID)?

A Business Improvement District (BID) is a defined geographical area where business rate payers vote on a business plan and agree to pay a levy into a fund for a fixed period to deliver it. Specific agreed initiatives set out in the relevant BID's business plan are then delivered to improve the area for businesses.

Businesses vote on whether they would like to establish a BID. If a majority vote in favour, then the BID is established and in future ballots at five-year intervals, continued. (BID members qualify based on a threshold of Rateable Value, only businesses over a certain size are eligible to vote and pay the levy).

The three city centre BIDs in Bristol, Bristol City Centre BID, Redcliffe & Temple BID and Broadmead BID, are operated by Destination Bristol trading as Visit West, the Local Visitor Economy Partnership for the West of England: <u>About Us - Visit West</u>

#### **Bristol City Centre BID**

Bristol City Centre BID was established in September 2017 and was extended to a second term in September 2022. Since 2017 this BID has invested over £5m in the city centre delivering a range of projects for the benefit of our levy payers.

The vision is a better Bristol for all, a future-focused, resilient city where businesses can thrive, people want to live, work and visit, a city that is safe for all to enjoy whatever time of day or night, and a place that is welcoming and appealing to everyone. It operates with four strategic themes; Enhancing, Promoting, Protecting, Supporting.

The Business Plan can be read here: Business Plan 2022-2027

#### Redcliffe & Temple BID

The Redcliffe & Temple BID was established in June 2021. It will invest £4.5m in the Redcliffe and Temple area over the course of the first term.

The vision is for a Redcliffe and Temple area that is vibrant, thriving, sustainable, inspirational and welcoming. It operates with five strategic themes: Creating & maintaining quality spaces, Improving sustainability & the environment, Creating & promoting a vibrant place, Connecting & representing businesses, Building a safe & caring community.

The Business Plan is available here: Business Plan - 2021 - 2025

#### **Broadmead BID**

Following a ballot in September 2023, Broadmead BID commenced its fifth term on 1 November 2023.

This will see more than £2m invested in Broadmead over the next five years.







Broadmead BID focuses on four main themes, each with its own projects and initiatives, driven overall by the vision of making Bristol Shopping Quarter everyone's favourite destination. A vibrant place to shop, work and socialise. The BID team's mission is to support all businesses, helping to drive footfall and deliver ambitious standards in all areas.

The Business Plan is available here: Business Plan 2023 - 2028

#### Why we are responding

Following guidance issued to local authorities in 2015 by the Department of Communities and Local Government (now DLUHC), the three BIDs were added to the Council's non-statutory consultee register in December 2021.

Please note that we are only responding to aspects of the Local Plan that we feel are relevant to the BIDs and our work with levy payers and that we feel we have the required knowledge and understanding of to respond to appropriately.

#### **BID Engagement**

To formulate this response, we organised a consultation event on 11<sup>th</sup> January 2024 with the three BID boards and Visit West board with the Local Plan team presenting and answering questions.

We also asked levy payers to contact us with feedback following the sharing of the consultation in our newsletters circulated to circa 1500 business contacts and on social media.

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#### **Our Response**

#### Policy DS1: Bristol City Centre

The three BIDs cover almost all of what is widely considered 'Bristol City Centre' with the notable exceptions of Temple Meads Station and M Shed/Wapping Wharf. We are passionate about improving the city centre as a place to work, visit and live. Bristol's city centre is evolving quickly with changes afoot moving Bristol's office district further towards Temple Meads, the redevelopment of Temple Meads, the redevelopment of Broadmead including The Galleries and Debenhams and continued competition with the expanding Cribbs Causeway retail and leisure offer.

The BIDs support a wide mix of uses within the city centre, including offices and other flexible workspace, retail, leisure and housing, and recognise that the city centre will need a wide-ranging offer to continue to thrive and offer something for everyone in the city. We recognise that the city needs more housing and that housing in the city centre will also offer valuable footfall to our city centre businesses. Whilst we support all our levy payers, we are especially keen to support independent businesses and our cultural sector and recognise that additional support will be needed to help this sector in the coming years; these sectors provide a point of difference that sets Bristol apart from other cities, towns and from out-of-town centres such as Cribbs Causeway.

We support ground floor uses and an increase in sustainability measures. Many city centre streets currently have too few active ground floors; active frontages playing a key role in creating streets with vibrancy and that are safe and welcoming for people to dwell and enjoy. We would specifically







like to see an increase of active frontages on several key streets in the city centre: Rupert St, Lewins Mead, Baldwin St, Broadweir, Victoria St, Temple Back East.

As noted below in this response we support the delivery of high-quality public realm and green space within the city centre. We recognise that as the population of those working and living in the city centre increases, this space will be crucial to the wellbeing of people spending time in the city centre; an ambition to increase dwell time as well as pure footfall will be key to supporting our businesses. Adding community facilities as a well as a range of experiences and high-quality public realm will contribute towards this.

As also noted below in this response, transport links will be crucial for the city centre's future. We hope that improved connectivity can be delivered by mass transit and improved bus services whilst walking and cycling on a regular basis becomes the norm in the city. We strongly recommend that the Transport Hierarchy is included in the Local Plan and would also like to see the adoption of the Healthy Streets indicators for the city centre and the development of a design code and Kerbside Strategy for the city centre's streets.

#### Policy DS1A: Bristol City Contro – Broadmoad, Castle B

## Bristol City Centre – Broadmead, Castle Park and the Old City

We support the ambitions for Broadmead and the Old City and echo the comments submitted as our response to the City Centre Delivery and Development Plan.

Our response is available here.

Key points made in relation to that plan were as follows:

- That the plan lacked an ambition or vision for St James Barton roundabout, and this was a missed opportunity for the plan to address one of the city centre's biggest transport challenges.

- That new transport links onto Temple Way and Bond Street from Cabot Circus would be a major benefit to accessing the city from the North and East.

-That community uses for a range of demographics will be key to the development community within Broadmead and the city centre.

- That an increase of height of buildings within the city centre has the potential to create excess shade and develop wind tunnels throughout the centre, we hope that buildings can be delivered at human scale throughout the city centre.

We support the proposal that 10% of ground floor spaces is made available for community uses to increase access to the city centre by a range of communities and to create a sense of community with the city centre – we would be keen to understand how this will be measured /work in practice.

#### Policy DS2: Bristol Temple Quarter

We support the plans for Temple Quarter and are actively working with the Temple Quarter team to feedback on design proposals and to help expand the reach of the ongoing consultation.

Our response to the March 2023 Temple Quarter Draft Framework consultation is available here.

Key points included in our response related to transport links around the area:







- It would be good to develop a vision for the A38, which passes through the site, as noted in our response; there is no reference in the consultation to the consideration of whether to reduce capacity on this road. It would seem contradictory to aim to make the areas around Temple Meads a beautiful, green, pedestrian and child friendly environment but not to consider downsizing the six lane road which runs through the area. (More recently announced proposals to re-route the A38 and remove through traffic from outside Temple Meads may now address this).
- We would also like to see proposals come forward to address access between the Bath Road and Temple Island to open up the site and that area of the city to more people.
- Considering the flood risk in this area, we would emphasise the importance of Sustainable Drainage Systems to slow the runoff into the Floating Harbour.

#### Policy DS3: St Philip's Marsh

We support this vision for St Philip's Marsh and recognise this as an opportunity to create an exemplar mixed-use neighbourhood. There is great potential for this this area to set a standard for a low car, healthy neighbourhood and provide quick, safe, and enjoyable transport links for those on foot and bike from Temple Meads to East Bristol avoiding the A38. The addition of thousands of residents living within 20 minutes' walk of the city centre will provide much needed footfall and customers for our cultural attractions, hospitality, and retail businesses.

We'd like to advocate for space to be found, either (within St Phillips Marsh or elsewhere) for a Coach Park. The existing coach parking supports the city's cultural and visitor attractions, in particular school and educational groups. It also supports the local economy which service tour groups and business events users who by staying in the city at night, support and contribute directly to the city's night time economy, especially food and drink and retail. We recognise that this is not an easy function to provide for an are happy to assist where possible.

#### **Policy DS5: Frome Gateway**

As above, we support the vision for Frome Gateway and again recognise that this is a good opportunity to improve access to the city centre along a flat and easily navigable route. We are keen to see walking and cycling routes to the city centre improved throughout this work. As above, the addition of residents living close to the city centre will support city centre businesses.

#### Policy IDC1 Development Contributions and CIL

We support the continued generation of CIL funding, which is available for organisations to bid for. The Redcliffe & Temple BID have benefitted from this funding pot and have been allocated funding to improve the subway under Temple Way by Bristol Central Church.

It would be good to work with organisations around the city to consider how allocation of CIL funding and the spending of allocated CIL can be delivered more efficiently and effectively. Currently, the process for gaining support from Councillors and Officers for CIL projects remains a challenge and once funding is allocated to a project, the council lacks resource to deliver projects (but is not willing/able to outsource the work). This is creating significant backlogs in spending allocated funding and improving the city.







#### Policy SV1: Social value and inclusion

We support the plan to expect major developments to produce a social value strategy – could this be 'must' rather than 'will be expected to'? We recognise that there is a high level of division within the city, and we are keen to support efforts to lessen this division and support communities around the edge of the city centre, especially to the East and South. We are happy to support Social Value proposals which help young people and those from disadvantaged communities find fulfilling work within the BID areas, supporting both those communities and our employers.

#### Policy H4: Housing Mix

We support the proposals to see more residents living in the city centre, we note the importance of community amenities and infrastructure to support an increased population. These amenities should include but not be limited to healthcare, education, sport and leisure, play, green space and fresh food.

We support the desire to see a greater balance of housing and mix of residents within the city centre, which in turn will support a range of businesses within the centre.

We encourage the council to consider all available options to help manage the unlicenced short term let sector, i.e. Airbnb and Vrbo. This type of accommodation holds an unfair advantage over hotels and other accommodation in the city and removes properties from the housing stock.

#### Policy H7: Managing the development of purpose-built student accommodation

We support an increase in the number of students living within the city centre. We know they support our city's retail and hospitality and cultural offer and bring life and vibrancy to the city. We acknowledge that this increase should be balanced by other housing types and therefore demographics.

It is worth noting that we are not aware of a medium to check whether an increase in purpose-built student accommodation is 'freeing up' HMOs in the outskirts and suburbs of the city to return to use as non-HMOs. This is a claim that is often made by developers when asking for support for their applications and is noted in paragraph 6.68 as a desire for the strategy but without a medium to track this, this is purely anecdotal. It seems more likely that an increase in purpose-built student accommodation is simply supporting growth in student numbers. It would be positive for the Local Plan to commit to tracking this more stringently.

We also note the need for sport and health facilities to support these increased student numbers. To our knowledge there are no plans for additional sports/leisure facilities being planned within and surrounding the city centre e.g. Multiuse Games Areas, Racquet Sport Courts etc which could impact on capacity at existing facilities and community users of student facilities. Consideration to the impact of this should be provided in the local plan.

#### Policy E2: Economic development land strategy

We welcome the continued development of high quality, flexible workspaces within the city centre.

As noted above, we are in favour of ground floor uses and would like to see residential and office developments include active ground floors within their plans. We would also encourage developers







to consider how affordable rents can enable charities and startups to take on these spaces and bring life to spaces including on a short-term basis until market conditions improve. An example where this approach could have been beneficial is Finzels Reach, where two units have only recently been let and one has remained empty since the development was built six years ago.

While limited details are available on the proposed Compulsory Rental Auction policy to allow Local Authorities to force landlords to let vacant space, we would support this approach in principle to encourage a more vibrant city centre.

#### Policy E6: Affordable workspace

We support the proposals to support the creation of Affordable Workplace, we recognise that this is needed to strengthen our cultural and community offer in the city as well as smaller companies and charities that may not be able to afford the high quality, high-cost office space currently being built and proposed.

#### Policy SSE1: Supporting Bristol's Centres – network and hierarchy - Local Centres and Parades

A new local centre is emerging around Broad Plain/Temple Quay with the opening of new retail/hospitality premises on Avon Street and Oxford Street and expected opening of new premises as part of the Soapworks development, and future use of currently redundant arches on Oxford Street.

Premises in this area are already playing a key role in servicing the increasing number of people living and working in this area and this trend will only continue in coming years. Premises located here as of January 2024 include: 4 cafes, 2 hotels, 1 deli, 1 pub, 1 home furnishings shop, 1 cycle shop, 1 restaurant, 1 supermarket and 1 outdoor equipment shop.

Could this be considered an additional 'distinctive part of the city centre' under this policy SSE1?

The development Temple Meads Station will also see additional retail and hospitality premises both inside the station and on The Friary – this may form an additional consideration.

Map on the page below:









As noted above, we would welcome the provision of more fresh food offers within the city centre, especially selling fresh fruit and vegetables and bread. The current success of the markets in Temple Quay and Finzels Reach is reflective of the lack of or at least perceived lack of other available options at lunchtime. However, it could also be argued that these markets suppress the opportunity for businesses to open and thrive nearby – as noted in our response to Policy SSE6.

We would be keen to support Bristol City Council to consult with restaurants and takeaways and food delivery firms to work through the challenge of the scooter-based delivery market which has established in the last few years. Within Broadmead and the Old City, businesses rely on this crucial market however the impact of the quantity of scooters visiting the city is significant with scooters frequently encroaching into pedestrian space to collect their deliveries.

#### Policy SSE3: Supporting Bristol's evening, night-time and culture economy

The BIDs are proud to support Bristol's evening and nighttime economy and welcome further support for this key sector.

It is good to see ambition to enable businesses to apply to use outdoor space more easily, but this could be clearer that the Policy Text is referring to the Highway and specifically parking spaces (rather than the pavement). This is a clear ambition in Lambeth's award-winning Kerbside Strategy Lambeth's Kerbside Strategy – reference 2.3 pg 24 and 25.

A clear process will support businesses that currently do not have outside space and lack the opportunity to both trade outside but also have a 'shop window' to their offer. Example of spaces







that would be improved with the conversion of parking spaces to space for businesses include Church Lane and Park Street Avenue.

We support the desire to ensure the Agent of Change policy is well respected and acknowledged to support the vibrant night-time economy sector.

#### Policy SSE5: Temporary uses in centres

We support the desire to see increased use of vacant buildings and sites for meanwhile use, which may include but not limited to temporary art exhibitions, space to sit and play and meanwhile business.

We would like to see a proactive approach to commencing meanwhile use by landowners to avoid useable sites sitting empty for extended periods of time.

Several sites in the city centre have been left empty for several years prior to development and detract from the appeal of the surrounding area – Plot 3, Temple Quay is the most notable example, this space could have been used and enjoyed for many years prior to commencement of development.

#### Policy SSE6: Retaining and enhancing markets

Markets taking place in the city centre should complement rather than detract from the offerings of city centre businesses and specifically should consider the food and beverage offer of businesses nearby. We have received feedback from hospitality venues in Temple Quay and Finzels Reach that they struggle to compete with the street food markets.

It remains a challenge to consider how we can support and recognise the success and popularity of the street food markets within the city centre whilst also supporting businesses within permanent units.

#### Policy SSE7: Provision of public toilets

We support the addition of more well-maintained public toilets in Bristol City Centre; we know from conversations with levy payers that this is a key issue for the city, especially for women, vulnerable people and those needing baby changing.

The consultation prior to the publication of the Redcliffe & Temple Green Infrastructure Plan indicated that there is limited awareness of the city's Community Toilet Scheme, especially for visitors to the city who are unlikely to go onto the Bristol City Council website to look for such a scheme – we would like to see an appropriate level of funding allocated to businesses who participate in the Community Toilet Scheme and an appropriate map to highlight all members.

The lack of public toilets has been raised as an equalities issue with women, children, and those with disabilities most benefiting from public toilets. Our cleansing contractor, Bristol Waste, often must deal with human waste in the city centre due to lack of public toilets. This is a particular issue during the summer when outdoor drinking and festivals are a popular part of life in Bristol.

We would like to see Bristol City Council, as well as new developments, provide public toilets.







We note the use of the word 'free' – perhaps payment of a very small charge – "low cost" – as is the case in much of Europe – may also be appropriate to manage toilet facilities.

#### Policy SSE8: Public houses

We support the protection of pubs within the city and commend the use of Campaign for Real Ale's viability assessment. As above, we would like to see a process developed so that our pubs can use outside space on the highway to increase their footprint and therefore viability.

#### **Biodiversity and Green Infrastructure**

We appreciate and endorse Bristol's One City Ecological Emergency Strategy, particularly the commitment to reversing wildlife decline and integrating nature into development. The emphasis on making the best use of previously developed land aligns well with the BID's Green Infrastructure and broader Climate Action initiatives. However, ensuring that net zero proposals are carefully implemented is crucial to avoid conflicts with essential aspects such as biodiversity, health and wellbeing, water neutrality, and nature-based solutions for sustainable drainage and flood mitigation. By maintaining this balance, the city can achieve its ambitious goals for sustainable development, housing, and transportation while safeguarding and enhancing its natural environment for all to benefit.

We would strongly encourage the development of a Green Infrastructure Strategy and Plan for Bristol to tie together all the pieces of work currently being undertaken as well as the various locations of opportunity from major redevelopment to neighbourhood and street level.

## Policy BG1: Green infrastructure and biodiversity in new development

The BID strongly supports the outline of this Policy, particularly emphasising the importance of diversifying Green Infrastructure within the city centre. We recommend incorporating private gardens 'and balconies' facing the public realm into the text, recognising them as valuable opportunities for urban greening. Additionally, we suggest explicitly mentioning the inclusion of the four other Green Infrastructure standards defined by Natural England;

Urban Nature Recovery Standard, Urban Greening Factor (UGF) for England, Accessible Greenspace Standards, Urban Tree Canopy Cover Standard.

We would also strongly support the development and implementation of the green infrastructure strategy standard:<u>gov.uk/government/news/natural-england-unveils-new-green-infrastructure-framework</u>

This would all complement the work which the Redcliffe & Temple BID has done in producing its Green Infrastructure Action Plan – a copy of which can be found here <u>www.redcliffeandtemplebid.co.uk/wp-content/uploads/2023/01/Green-Infrastructure-Action-Plan-February-2023.pdf</u>

Considering the unique challenges in urban areas like the city centre, we propose the text to state the 'minimum' Urban Greening Factor targets (0.4 for residential and 0.3 for non-residential), favouring higher percentages to address the limited Green Infrastructure in these concentrated urban heat island areas. It is essential for applicants to submit their Urban Greening Factor calculations alongside the design and access statement for both small and major development sites.







Furthermore, we recommend placing a stronger emphasis on nature-based solutions for sustainable urban drainage, insects in general, not just pollinator insects (also links to lighting adaptations to encourage pollution growth of night-time insects) and highlighting the vital connection between nature and public health in the policy narrative. We note that Urban Heat Island needs stronger emphasis linking with the Keep Bristol Cool strategy.

#### Policy BG2: Nature conservation and recovery

Although the BID boundary is not directly within a protected site, it is close to a SNCI, the River Avon. Previously, the Floating Harbour was allocated as a buffer to the SNCI, Local Wildlife Corridor as shown on BCC PinPoint; however, it is not clear what this designation means and its impact on development proposals or nature recovery plans is: <u>PinPoint - Local Wildlife Corridor</u>.

Despite the Floating Harbour being a key blue infrastructure feature which needs a level of protection for the wildlife and habitat that exists there, there is no mention of this Nature Corridor in the Local Plan. The BIDs would be keen to support future enhancement for wildlife in this corridor and work with the Castle Park project to improve this area of the city.

## Policy BG3: Achieving biodiversity gains

We welcome this policy and anticipate its implementation in urban development. Offsite Biodiversity Net Gain (BNG) should be explored for future urban sites, contributing to overall biodiversity enhancement.

#### **Policy BG4 Trees**

The BID supports this policy as trees are a positive contribution the city centre, socially, economically, and environmentally. It would be advisable that the tree policy also links with the Green Infrastructure Standard from Natural England for Tree Canopies; this will ensure that the city's tree strategy is in coordination with national standards and best practices and strengthen the link with BCC's aspiration to double the tree canopy in Bristol. Also, there is a need to state a link between climate mitigation and health e.g. type and location of trees to be informed by the Keep Bristol Cool urban heat mapping to help mitigate urban heat island effect. Also the importance of a long-term maintenance strategy needs to be emphasised (if the trees – retained and proposed – are outside of the BNG requirements).

Where possible, we would like to see trees placed in the carriageway rather than taking up valuable space on the pavement. As noted in the policy statement, the maintenance, including watering, of city centre trees will be crucial. Co-ordinating businesses and residents to water trees in summer may help survival rates; we would be happy to support with this: <u>Residents asked to help water new street trees (hackney.gov.uk)</u>

#### Policy BG5: Biodiversity and access to Bristol's waterways

We support the desire to maximise the health and access to our waterways, floating solution, flood mitigation, active frontages (although this needs to be defined further), especially Bristol's harbour, one of our finest assets. There needs to be a stronger emphasis on creating areas for people to sit (informally and formally) in balance with improvements to biodiversity. Signage or visual indicators to help people ordinate themselves and link to the history of Bristol should be included in this policy.







We note the designation of areas as Local Wildlife Corridor has been removed; the LWC needs to be reinstated and stated as a buffer for the SNCI or, at least, it should be added in this policy that it acts as a buffer for SNCI's to help strengthen intent and connections.

#### Policy BG6: Private gardens

While private gardens are scarce in the BID area, we advocate for the inclusion of provisions in the policy addressing the treatment of balconies facing the public realm. Balconies are vital to urban character, and we encourage greening them to enhance visual impact, public enjoyment, and urban green infrastructure.

#### Policy BG7: The St Pauls green link

We would support the creation of a walking/cycling route through St Pauls to create a more enjoyable and more accessible route to the city centre.

It would be beneficial for the reader if, within this Policy Text, there was a rough map of the proposed route to make it easier for stakeholders to understand.

#### Policy GI A: Open space for recreation

The BIDs are actively pursuing opportunities to improve both pockets of public realm within the city as well as parks including Brandon Hill, Temple Gardens, Portwall Gardens, Quaker Burial Ground and green space outside Freshford House. It would be beneficial to develop a process to enable willing funders of improvements to green spaces (such as BIDs) to engage with BCC Parks and Landscape teams to develop these proposals and bring them forward as soon as possible.

It is good to see that the council are actively engaging with Make Space for Girls when re-designing public space and green spaces.

Our response to the Castle Park proposals as part of the DDP was summarised as follows:

We support the proposed vision and above aims for the park and recognise the potential that an enhanced Castle Park can have on the city centre, creating an attraction for people of all ages and backgrounds and highlighting the historic nature of this part of the city.

We would advocate an explicit mention of Castle Park being a first-class place for children and young people should be added a sixth aim for the park – this would give a clear reference to the desire for the park to evolve and be an attraction for young people and their parents/guardians, a differentiator from its current primary uses.

## Policy GI1: Local Green Space

It would be useful within this Policy Text to provide examples of different spaces and how they are categorised against the terms; Local Green Space, Reserved Open Green Space, Incidental Open Spaces.

It would be beneficial to develop a process whereby residents can apply to establish parklets on the highway for people to use to sit, socialise and to add greenery. As above, this in referenced in Lambeth's Kerbside Strategy – reference 2.1 pg 22-25 and here: <u>Parklets | Hackney Council</u>







# Policy T1: Development and transport principles, Policy T2: Transport infrastructure improvements and Policy T3A: Transport development management

We are keen to support the council's aims to reduce car use in the city and increase use of sustainable modes. We know that many of our businesses s support this aim and that the current changes to make the city centre a healthier, less car dominated space are broadly supported.

It would be beneficial to see the Transport Hierarchy outlined within the Local Plan, setting a clear expectation of the prioritisation of transport modes for the city.



We would support the development of a Bristol Transport Plan to outline how we are going to reduce carbon emissions and vehicle miles in Bristol to create a healthier, more environmentally friendly city. We recognise that there is significant work being done at the moment with public transport, walking and cycling as well as continued efforts to develop a mass transit scheme; however, it would be good to see these come together as part of a wider transport plan.

An example of good practice is Leeds City Council's Transport Plan which includes the vision 'Our vision for Leeds is to be a city where you don't need a car', clearly setting out where the city wants to get to. The Leeds City Council Transport Plan is available here: <u>Connecting Leeds Report Appendix 2 111021.pdf</u>

Within the Transport Plan could sit other key plans, including Parking Strategy, Vision Zero, Kerbside Strategy and other Action Plans.

The recently published Southwark Streets for People Plan also sets out priorities very clearly: <u>Streets</u> for People strategy 2023-30 by Southwark Council - Issuu

We are aware that a motion was approved at Full Council in July 2023 to target Vision Zero, i.e. zero road deaths by 2030; it would be beneficial to see this referenced in the Local Plan and a plan developed to achieve this target.







We would recommend the use of the Healthy Streets indicators to frame transport and public realm work in the city. We would like to see the adoption of the Healthy Streets approach as a formal assessment of street design and transport schemes throughout the planning, design and consultation phases.

The ten Healthy Streets Indicators are as follows: <u>Healthy Streets.com</u>.

Everyone feels welcome, Easy to cross, Shade and shelter, Places to stop and rest, Not too noisy, People choose to walk and cycle, People feel safe, Things to see and do, People feel relaxed, Clean air.

We would like to see a reference to health included in the Policy Text – an effective transport network offers big opportunities to improve health by enabling people to walk and cycle and get to places they might otherwise not be able to. We know that many people in the city struggle to undertake the recommended amount of exercise and transport improvements should play a key role in changing this.

We would like to stress the importance of timely and proactive consultation with businesses in various formats. This will help to understand businesses' needs and engage them with planned changes to alleviate concerns and misinformation. We are of course keen to support with this and continue to share upcoming consultations as well as host an Annual 'Transport Update' with Bristol City Council.

We would support an increase in wayfinding and signage throughout the city centre to enable efficient and inclusive active travel for workers, residents, and visitors to the city and would be happy to support funding of this project. We would also like to see consideration made to signage including different languages.

#### Policy T4A: Parking, servicing and the provision of infrastructure for electric vehicles

We would support the development of a Parking Strategy for the city/city centre which supports the city's aim to reduce vehicle miles and free up space for other uses such as trees, parklets, space for businesses and scooter/bike parking. This recent publication by the Transport Planning Society outlines a number of policy steps for Local Authorities to take to help appropriately manage parking: <u>TPS Parking Policy Statement.pdf</u>

We would support the provision of charging infrastructure in the city centre; however, we would put a caveat with a balance against making it easier and cheaper to drive into the city centre, which would be against the city's policy goals.

Electric Vehicle chargers should be placed on the highway rather than on pavements.

We would also like to see more thorough plans put in place by developers/construction companies to ensure that transport routes are not closed during construction. We have seen recent examples where entire routes are closed rather than working, with the council to create alternatives; examples of this include Bond Street where the pavement and cycle route were closed to install the advertising screen forcing pedestrians into the busy road, and currently <u>Lower Maudlin Street</u> where the pavement has been closed for a number of years now, forcing pedestrians into the road.

Policy NZC1: Climate change, sustainable design and construction, Policy NZC4: Adaptation to a changing climate, Policy FR1: Flood risk and water management







We support the development of energy efficient, sustainable buildings and that buildings can adapt as our climate changes.

We would support the inclusion of a reference to Green Infrastructure, especially trees in helping to mitigate and adapt to climate change.

We support the desire to minimise flooding. Further work on the Redcliffe & Temple BID Green Infrastructure Action Plan identified most of the Redcliffe and Temple area as an area of significant flood risk. We would support efforts to add sustainable drainage schemes and tree planting to reduce surface water runoff in the city centre.

The BIDs are developing a relationship with Wessex Water with the aim of working together to install a sustainable drainage pilot in central Bristol to demonstrate how we can work together to address this challenge.

#### Policy NZC2: Net zero carbon development – operational carbon

We support the desire for developments to eliminate use of cooling systems; we note the number of glazed, south facing buildings in the city centre and the challenges these buildings will have as our city increases in temperature and the impact of the energy involved in cooling these buildings via air conditioning systems.

We know from our Green Infrastructure Action Plan that much of the city centre is vulnerable to extreme heat and we are committed to helping reduce this where possible.

#### Policy DPM1: Delivering well-designed, inclusive places

We support well designed buildings and developments but are not experts on the design and architectural quality of the buildings themselves. Our particular focus would be on the creation of 'Healthy Streets' and enjoyable place to spend time, and the assessment of developments and streets against these criteria; see <u>Healthy Streets.com</u>.

The ten Healthy Streets Indicators are as follows:

Everyone feels welcome, Easy to cross, Shade and shelter, Places to stop and rest, Not too noisy, People choose to walk and cycle, People feel safe, Things to see and do, People feel relaxed, Clean air.

We understand that Bristol City Council officers have undertaken the Healthy Streets training but we would like to see the adoption of the Healthy Streets approach as a formal assessment of street design and transport schemes throughout the planning, design and consultation phases.

#### Policy DC2: Tall buildings

We are not experts on the pros and cons of taller buildings from an environmental and social perspective and recognise that this topic requires further work to follow on from the 2018 Urban Living SPD to further debate the issue.

We understand there is current concern regarding proposed heights of redevelopments in Broadmead from businesses who feel that the buildings will shadow and dominate over other buildings in the city centre.

We would question the assertion that tall buildings will contribute positively to the built environment or 'enhance the appearance and character of areas' (by virtue of simply being tall).







There are a range of factors that contribute towards a building's appearance and character with recent examples of taller buildings in Bristol not widely considered to have made a positive contribution to the city's built form or beauty simply through their height.

#### Policy CHE1: Conservation and the historic environment

We support the proposals to protect Bristol's historic assets; any removal of a heritage asset must be well considered given that its removal is likely to be irreversible.

#### **Policy AD1: Advertisements**

We believe that the large number of advertising units and telephone boxes in the city centre, especially in Broadmead, significantly detracts from the pedestrian and general experience of the public realm without any benefit to the community.

This map shows that there are currently 8 advertising units and 12 telephone boxes in Broadmead: <u>Phone Boxes and Advertising Units in Broadmead</u>

The units generate noise and light pollution and use significant amounts of energy, contradicting the city's net-zero ambitions. Units in Broadmead have also been known to advertise Broadmead's main rival, Cribbs Causeway, much to the annoyance of retailers.

Interpreting the above policy text noted it is difficult to see how any future electronic advertising units would be appropriate/allowed within the city – we would support this approach.

It would also be beneficial to explore how BCC can start to enforce removal of redundant phone boxes as was done by Camden Council in 2023.

In addition to the points noted, we would like to see an additional reference to advertising units blocking footpaths and cycle lanes; this is particularly apparent with the new large screen on Bond Street where no reference was given in the officer's report to reference the fact it was being placed on a well-used shared-use cycle and walking path.

# Policy FS1: The provision of allotments, Policy FS2: Provision of food growing space in new developments

We support the provision of food growing space within the city centre.

This policy will need thorough checks regarding 'practicality' as it is likely that many developers will consider it easier and potentially cheaper to provide or fund space off site than to incorporate it into a dense city centre development.

## **Development Allocations: Central Ward**

## BDA0801 – The Grove Car Park

We would support development in this location; however, we would encourage development to be sympathetic to the height and design of similar surrounding buildings on Prince Street and Queen Square and also leave space surrounding the building at the waterfront edge.







This location, particularly at the Western end of the site (next to Prince Street Bridge) offers a great opportunity for a well-designed piece of public realm for people to enjoy. A reference to a place to sit/rest/play should be included in the Development Considerations in addition to the existing reference to the development of a high quality walkway.

We would also encourage active ground floor uses to bring life to this location but caution against more venues that are focussed on later evening drinking due to the proximity to the water and other similar venues nearby.

We note that it would be preferable to maintain the view of and from the balcony of Mud Dock, a well-established independent business.

#### BDA0802 - Land At Redcliffe Way

We would support development in this location and support the previous proposals put forward by the <u>Redcliffe Neighbourhood Forum: Redcliffe Neighbourhood Development Plan 2016</u>

We would support approaches to reduce the size of Redcliffe Way and the roundabout, although note that this would most likely involve the removal of the trees to create a more efficient use of space and connect all sides of the roundabout together.

We note that Redcliffe Way now features as part of the Temple Quarter project.

We would like to see a reference to creating a high quality public realm and play facilities for residents, visitors and local office workers to enjoy.

We would support the redevelopment of Portwall Lane Gardens and the removal of the car park that currently sits within the park; this is an inappropriate use of this key piece of green space within the city centre and prevents a wider ambition for a larger park. Our ambitions for this park are set out here: <u>Community-Infrastructure-Levy-Portwall-Gardens-Version-4-1.pdf</u> (redcliffeandtemplebid.co.uk)

## SA202 - Land to the west of Lodge Street

We would support appropriate development in this location and would support, as already noted, ground floor use on Trenchard Street.

## SA403 - Old Seaman's Chapel, Royal Oak Avenue, fronting Princes Street

We would support redevelopment of this currently unused site in a key city centre location. As noted, we would support active ground floor uses.

#### SA404 – 16 Narrow Quay

We would support redevelopment of this currently unused site in a key city centre location. As noted, we would support active ground floor uses.

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End











