



## **WHaM response to the Bedminster Green Framework prepared by Nash Partnership**

### **1.0 SUMMARY**

The group thanks Nash Partnership for the opportunity to provide feedback on the proposed Framework and, as evidenced by our own site brief, supports the idea of redeveloping the area covered by the Framework and recognizes the land could be better utilized as an area adjacent to Bedminster town centre.

The Framework represents a great opportunity to shape the future of an underdeveloped area of the city in a way that can blend the differing characters and areas of the city. We agree with many of the ideas set out in the document but are concerned that there is a lack of firm rules or commitment for development to follow. We are also concerned, given the proposed detailed applications we have seen, that the aspirations of the Framework have already been contradicted and that the document would be improved by having clear enforceable rules. We particularly disagree with the proposal to cut off Whitehouse Lane from Hereford Street/ Windmill Hill. Finally, a cluster of tall buildings is out of character for the area, and WHaM members fundamentally disagree with tall buildings of the proposed heights in Bedminster Green.

We feel that there are a few points of inaccuracy within the document and some contraventions of planning policy.

### **1.1 Aspirational document**

We recognise that, rather than a rulebook, it is framed as an aspirational document covering an area comprising five different sites and the roadways and spaces between them. Each site has a different programme of accommodation associated with it and could have the potential to shape the future development of the area. The group felt however that the document stopped short of trying to do this.

There was much talk of possible gains within the Framework, for example:

- opening up the Malago river
- providing street planting and new trees
- a larger green with improved habitat
- an improved station
- a 'mixed housing offer'
- good microclimate and air quality

There is no definite commitment to abiding by any of these aspirations within the document. Indeed at one point it suggests that none of this may occur due

to budget constraints, which seems to undo the entire worth of the document.

### **1.2 Potential for future development of the Framework**

The Framework is a potential leaping off point for the city to create a full masterplan for Bedminster Green in order to create a vision for a new area of the city that will cater for the needs of its residents over the coming years in the face of serious environmental and economic issues. Bedminster Green could become a beacon for high quality design across the city and beyond, but the Framework needs to ensure a commitment to it with design codes and drawings that have to be abided by.

### **1.3 Development of infrastructure**

The group understands that there are five distinct sites within the Framework in many cases separated by roads. However it is not always clear whose responsibility the design of the urban realm between plots will be. Further detail on street and carriageway design is required.

A collaboration between developers and the Council is needed to ensure the delivered set of sites and infrastructure suits the needs of the existing and future communities. Other large scale developments in this country, such as Kings Cross in London or Millbay in Plymouth, have included development consortiums overseeing the appropriateness and integration of the entire proposals.

### **1.4 Other applications and proposals**

At the time of writing we would also note that a detailed application for St Catherine's Place has been submitted and two others (one for Little Paradise and Stafford St and one for Plot 1, Pring St Hill) are expected in the near future, the details of these applications are not covered by this document.

Furthermore the detail of the applications and drawings shown at public exhibitions show far more development than the Framework document would suggest is going to occur, particularly in terms of height.

Given that the developers must have had conversations with Nash Partnership during the course of development how can the document be taken entirely seriously if its authors know the detailed applications have already contradicted it?

## **2.0 DETAILED RESPONSE TO THE DOCUMENT**

### **2.1 Existing uses**

The Framework implies that several of the buildings within the Framework have been empty for some time, this has only been true of the GPS buildings (between Little Paradise and Stafford St) since their sale.



We would also note that at the time of writing the site of St Catherine's has no empty offices, these have already been converted to residential apartments.

The map on page 15 shows proposed uses but does not include the warehouses between Stafford St and Little Paradise, but surely should. The document should also make a commitment to at least replacing the workspace intending to be taken up by residential development, this would aid the aspirations relating to community and sustainability if present, providing opportunity for local workspace with a limited travel distance.

## **2.2 Consultation**

Whilst the group is pleased that the Site Brief prepared by WHaM is noted as requiring consideration, we are concerned that the document mentions ongoing consultation. This has not happened. A single stakeholder meeting and exhibition, after the draft Framework was made public, cannot be called ongoing consultation. There has been no discussion with our Neighbourhood Planning Group during the Framework's preparation.

## **2.3 Housing mix**

The document calls for a range of tenures (page 26) but does not define them. To date, in the detailed applications, we have seen only one type of accommodation – 1 and 2 bedroom flats. In order to confirm that the developers are indeed meeting the needs of the community the document should be as specific as it can, showing how it is meeting the gaps in current provision.

There is no discussion of housing types other than to acknowledge that “a balanced community is formed through a mix of homes and choices”. To date in detailed applications we have seen only flats - no duplexes, maisonettes, townhouses or any other options. The Framework is an opportunity to ensure a variety of housing is provided and that a monoculture of flats is not provided.

There is an opportunity here to confirm the level of affordable housing that developers are expected to provide. It is not included in the document, leaving the area at risk of a glut of single house types which may not be suitable for a varied community with differing housing needs.

Current applications show a lot of single sided apartments which feel unattractive and undesirable for future residents.

## **2.4 Sustainability**

The desire to create new development in a sustainable fashion is to be applauded. The approach to minimise energy demand whilst maximising renewable generation to 100% of demand is commendable, if delivered. Again, there is no solid commitment to doing this but given the Framework is

in place this is an opportunity to create an exemplar for the rest of the city.

The Framework should contain a commitment to a sustainable heat network, if this can be delivered without harmful emissions. Bristol City Council has a commitment to be carbon free by 2030 and the UK aims to be carbon free by 2050. It is also noted, in line with Bristol Planning Policy, that CHPs are not a sustainable measure but are an energy efficiency measure. We would also add to this the observation that Bedminster is an Air Quality Management Area so harmful emissions should be minimised.

Sustainability is about more than just energy use. Creating a sustainable, healthy environment is also a part of this. A solid commitment to green infrastructure and revitalising the Malago is important. Creating a sustainable, green infrastructure for exploring without a car will help the area. There will need to be regular, green breathing spaces, and a transport plan that will avoid channeling and retaining car emissions on the streets.

## **2.5 Flooding**

Both green and blue infrastructure are noted as aspirations for the area but there is no definite strategy set out within the document as to how this will be dealt with. If in the area evacuation routes are required across the site this should be declared, to ensure other development does not impinge on it. If minimum floor levels are required for development in this area, surely this should be declared at this point. If flooding is to be such a high priority for the area then why is no flood risk assessment or flooding report included within or alongside this document? If these material concerns have implications for the development of the area then they should be taken into account within the Framework and laid out for the developers to use and to reassure the public (including prospective residents). It seems unlikely that anyone can make an informed decision without this.

Some guidance on how the development will promote sustainable drainage would also be welcome given that the Framework covers land that is not only taken up by building (where detailed applications for buildings will not cover the area surely the Framework must pick it up). A calculation taking into account climate change and expected rainfall together with a strategy on how to deal with water over the whole area would seem to be an essential part of the document and yet is absent.

## **2.6 Height**

The section on building heights seems to be the item in the document with the most detailed information. It notes the need to understand local ridgelines and respond accordingly, yet it fails to do so. It also shows Bedminster Green surrounded by tower blocks on all four sides, making it feel hemmed in. The interface at East Street may be shown as sympathetic but the west end is ignoring the local ridgelines and placing six-nine storeys adjacent to three-

storey duplexes and flats.

The southern interface against Windmill Hill also seems inappropriate, concealing much of the terracing on the hill and its topography within central Bristol, which provides a distinctive feature of the area. It was felt that rather than work with the existing character areas, the proposed strategy is concealing it and trying to dominate it.

On p59 the document notes that tall buildings should not be overbearing but the potential for concentrating tall buildings around the green would do just that. The Framework should insist upon lower surrounding blocks, as noted in the Urban Living Supplementary Planning Document, any taller elements should not front onto the façades of the buildings, and only be applied to discrete elements, not the entire block or frontage.

There is no detail in the document as to why the heights specified are appropriate for the area. Buildings above five-six storeys, or a cluster of tall buildings is out of character for the area and should be avoided.

The detailed proposals presented to the local community so far include a 22-storey tower, a 17-storey tower and 13-storey buildings. WHaM members do not want to see buildings of these heights in Bedminster Green.

These proposals already contradict the Framework and far from containing discreet elements at high level are:

- in the case of St Catherine's the width of the entire block
- between Stafford St and Little Paradise the centre of the elevation against the street
- the Pring St Hill Site is 11 storeys on one block and 13 on another, these taller elements take up more than half of the width of the block and dwarf the neighbouring community.

The details of the proposals contradict the Framework, and these proposals must have been produced alongside the Framework, so one of them must have precedence. The Framework as the overarching document would seem to be the best choice.

Large parts of the green and adjacent buildings might be overshadowed by the indicated tall buildings, making the external realm unattractive and unusable, and depriving neighbouring buildings of sunlight. A shadow analysis should be undertaken to confirm the implications on the proposed green spaces and existing residences around the neighbourhood.

## **2.7 Transport**

The document notes an increase in train services from the local station will

make the development viable and reduce the need for car ownership in the local area, but does not say when this increase will take place. If the improved station is required in order to accommodate more trains and more people, then the station should be improved early in the overall development. So far we have not seen any details on this aspect of the development. In order to make an informed decision on this aspect of the Framework it will be necessary to understand how the public realm and access to the station will work. So far the detail is insufficient.

There is no transport assessment present so it is difficult to see justification for all aspects of cycle and pedestrian routes. Are these in the right places? How do they continue on from the Framework area? There are concerns that existing cycle routes may not be sufficient for the additional traffic.

How will traffic be dealt with when the university accommodation is occupied and vacated at the start and end of each term? Parameters for the anticipated traffic should be set out and response strategies set out so that designers can incorporate them and anyone reading the Framework can act from an informed position.

There should be additional detail on parking arrangements, how many spaces total across the Framework area and what measures will be in place to stop street (pavement) parking.

WHaM are dismayed to see the proposal that access to Windmill Hill is to be from Hereford St only. This is the only traffic entry and exit onto the hill from the north. No further information is given for this and no explanation, nothing to show that this proposal has been thought through. The proposal would cut off an important link for local businesses on Whitehouse Lane. It will make it difficult for many local residents to get to and from work at key times and divert much more traffic onto Malago Rd, Dalby Avenue and Bedminster Parade which already have severe air pollution problems.

It is entirely contradictory to the aim of the document which is to revitalize these streets with new (pedestrian) shoppers. Dalby Avenue is the street that the Framework seeks to make residential focused. There should be proposals to limit the effect this increase in traffic will have on the existing residents who live adjacent to the development as well as measures for the new dwellings proposed.

## **2.8 Connectivity**

The document shows aspirations of improving the connectivity to both sides of East St, how will this be done if the street is outside of the Framework area? This does not seem like a realistic possibility delivered by the Framework if there is no clear strategy about how it will be delivered, using what money and by whom.

## 2.9 Streets and open spaces

Policy BCS 21 requires developments to safeguard the amenity of existing developments, noting:

*Consideration should be given to matters of privacy, outlook, natural lighting, ventilation, and indoor and outdoor space. Development should also take account of local climatic conditions.*

The Framework should set out guidance therefore for responses to this, identifying where this limits proposed outlooks and might harm levels of privacy. The flats along Malago Road and around St Catherine's Court are examples of where this might occur (but not the only areas).

There is an opportunity to confirm suitable street widths to accommodate proposed traffic here as well, but the document stops short of setting these out and, as noted previously, does not include a transport assessment.

We note that the proposals we have seen to date respect the existing street layouts and widths that suited buildings of three-four storeys typically and that the document makes no reference or imposes no controls on the street widths that would be completely overshadowed by the scale of development it enables. The SPD on Urban Living requires a '*Comfortable scale of enclosure that is appropriate to the existing character and function of the street*' it is therefore logical that existing street widths and patterns should feedback on an appropriate scale of development if they are to be followed unchanged.

Pages 30 and 31 of the supplementary planning document also call for:

- lowering building heights along the south side of the block to allow sunlight penetration into the site
- the limiting of overshadowing along pedestrian priority routes
- setting back building line to accommodate spill out space and active uses, on sunny side of street(s).

All of these principles would partly improve the public realm and yet the Framework document does not include reference to these items as design issues, instead suggesting that the south side of the blocks overlooking the green can be among the tallest part of the emerging sites. That no shadow analysis has been included in this document suggests design principles for the public realm need much more work doing to them, This document would seem to be the place to set them out.

Who will take responsibility for designing, laying and maintaining the new cycle paths and pedestrian routes outlined in the document, this is not clear.

The proposed cycle route along Clarke St is also a concern in terms of delivery as a lot of it falls outside the sites shown in the document, a strategy must be set out for procuring these and clearly outlining responsibility for

them.

### **2.10 Green infrastructure**

The document makes much of an aspiration of creating improved public space. It is however simultaneously showing a space hemmed in on four sides by buildings.

This does not sound like welcoming amenity space described in the SPD on Urban Living which makes note of the requirement for sunlight into pedestrian areas. Neither does it sound like the 'improved habitat' referred to in the Framework, as it seems the green gets more light currently than it would with the outlined development shown. Indeed with the level of enclosure proposed it seems that it will be less hospitable to wildlife with those buildings than now.

There is no shadow study included to show how much sunlight will reach the square throughout the year but evidence will be needed to show that the landscape design for this area is effective, and hospitable to wildlife and simultaneously suitable as amenity space.

### **2.11 Community infrastructure**

The Framework states that new residents will be able to make use of existing infrastructure, but fails to provide any detailed studies or figures. Surely the potential provision of over 1,000 flats would have a major impact on the local infrastructure. The community feels that the current provision of doctor's surgeries, schools, and the like, are already stretched. The health centre on St. John's Lane/Wedmore Vale has closed and the site is sold, the assessment of local provision for healthcare should not include this, a revised assessment should be done.

There is concern that the document has also not taken into account other developments in the area which might affect this provision, for example the proposed redevelopment of the Broadwalk Centre on Wells Road, and Factory No.1 on Bedminster Parade. To avoid counting the facilities twice, it would therefore make sense to reach out to these other major developments and assess provision in combination with them.

### **2.12 Accessibility**

The document notes that housing will be designed to be adapted to wheelchair accessible housing in the future. Given that such a large number of dwellings is proposed it would surely make more sense to include a number of wheelchair accessible units from the start.

### **2.13 Heritage**

The document notes that there are no heritage assets in the area but according to 'Know Your Place' accessed from the Bristol City Council

website a portion of the St Catherine's site sits within the conservation area and one of the buildings is locally listed.

The Malago River also has an industrial heritage (previously supplying tanneries and smelters) this Framework provides an opportunity to locally provide some information on this and perhaps make more of this asset through community artwork or interpretation.

We would note that St John's Churchyard, to the west of the Framework site, is also a monument and development adjacent to this should not damage or harm its setting

The Pring St Hill site (Plot 1 of the Framework) is also a local monument (former engine works) and should be noted as such and appropriately respected by any development.

#### **2.14 Views**

The document suggests that no significant views will be harmed as there is only one viewpoint to be taken into account from Victoria Park, this however is not consistent with the SPD on urban living that notes that visual impact assessments should take into account views of prominent local landmarks. A single viewpoint is insufficient to be the sole visual assessment for impact over the city. There is a danger that views to and from Bristol Cathedral, Cabot Tower, the Suspension Bridge, The University of Bristol Engineering Building, The University of Bristol Medical School, and local landmarks such as the Robinson Building will be obscured, blocking vistas to and Victoria Park and Windmill Hill. The Framework has an opportunity here to protect viewing corridors. Assessments should be from multiple locations to ensure the amenity is not compromised by development.

### **3.0 CONCLUSIONS**

The Framework represents a massive scale of development that is rare in any city. The opportunity to create a new quarter for the city is one that cannot be overlooked. If each site is allowed to be developed individually, without the control of an overarching enforceable Framework that sets out a realistic scale of development and ensures that the proposed benefits for the area are included, it will be lost. It is vital that the developers and City Council work together to provide further detail and design controls on the proposed development. Without these controls it is difficult to see this Framework as anything other than a starting point that may become soon redundant. It must have rules and commitments that will be followed.

Any development going into the future must be sustainable and have an enduring chance of being a healthy place to live. The Framework cannot allow developments to ignore long-term needs in favour of short-term benefits.



We also noted a number of missing items that should be included in this document, such as transport assessments and shadow studies. These need to be disclosed and strategies explained before this Framework can be adopted, especially given that the proposals include items that will impact heavily on this.

For this development to be successful going forward, integration with communities and contexts on all sides will be important. Ongoing consultation will still be necessary with all surrounding neighbourhoods, ensuring they understand the implications for them as much as for the future of the area.

WHaM believes Bedminster Green is a once-in-a-lifetime opportunity to build a great place to live, where people will choose to make their home. The current Framework proposals fall short of setting out appropriate parameters to support this aspiration.