



an independent force for a **better Bristol**

Response to the City Centre Framework April 2018

1 Introduction

The Society welcomes the aim of this City Centre Framework (CCF) consultation document to set out both a spatial framework and a movement framework, guiding the future vision for such an important part of Bristol. In principle, such a joint spatial/movement framework could be a template for other areas across Bristol that have been newly designated for urban living. However, we are disappointed that this document is not more visionary and more holistic.

2 Suggested areas for improvement:

2.1 Purpose and value of the document

Whilst welcoming the CCF in principle, we think it could be improved in the following respects:

- **vision/guidance:** it is unclear what the document adds by way of planning policy or vision/guidance for developers. Developers want to see a vision for an area, but this document's vision seems somewhat emasculated. Developers also want a specific brief at a site level, but unlike the Temple Quay Spatial Framework, this document does not go to that level of detail. It would be helpful for planners and developers if there were a list of priorities into which CIL payments and s.106 monies, where appropriate, could be channelled.
- **the area covered:** we understand the logic for the area chosen – it fills in a gap between the areas covered by other plan/framework documents. But a movement framework for the city centre needs to cover a larger area than this one does: we would like to see the council produce a movement framework for the area within the inner ring road, including the arterial movements for all modes into and out of the area.
- **timescale:** it would be helpful if the CCF made clear what its planning time horizon is – 5, 10, or 20 years like the Bristol Transport Strategy. The longer the time horizon, the more visionary the document should be.
- **delivery and implementation:** whilst we recognise that this document is a spatial and movement framework and not a development plan, it would be helpful if the document said more about how the proposals will be taken forward, who will take responsibility for taking it forward, and how its elements will be funded. This would help to allay any concerns that this framework might sit on the shelf with little further action.

2.2 The movement framework is incomplete

The CCF movement framework is fine as far as it goes, but we think the proposals could have been much better. It lacks ambition and seems a missed opportunity. We support the key objective (page 4) of “Tackling traffic congestion; making the city centre better connected, accessible and healthier”, but the document fails to follow through on this objective.

The CCF movement framework should start from some basic principles and cross-Bristol measures, but does this only partially (eg it mentions Park and Ride), probably because the full assessment awaits the Bristol Transport Strategy (BTS). We would expect the BTS to address in more depth the controlling of traffic entering the city centre, and to consider issues/measures such as freight consolidation, delivery vehicles (rising with internet shopping) and points of collection, road pricing and/or a parking levy. The CCF could then go into more detail about the impact of such things in the city centre, including the enabling of reallocation of road space.

The CCF movement framework should be based on the following key principles:

- the objective must be movement of people, not movement of vehicles.
- motor traffic volumes in city centres need to be reduced (including rationalisation of commercial deliveries) to improve air quality and encourage more walking and cycling, and keep public transport moving. This requires some physical restraint, with permeability for cyclists.
- road space should not only be re-allocated from motoring to cycling, but also cyclists should be segregated from motor vehicles (including buses) on all busy roads.
- road space in some places needs to be reallocated to pedestrians, including continuous pavements which are particularly beneficial for younger, older, and disabled pedestrians.
- people on bicycles should be segregated from people on foot where volumes of walkers and cyclists are high. This avoids conflict and collision risk, and allows faster cycling.
- car-dependent travellers going to the city centre should be encouraged to transfer to a more sustainable mode (public transport, cycle hire, secure cycle storage, walking) as early as reasonably possible in their trips.

We think that the CCF movement framework could be improved in the following respects:

For example:

- **walking network:** we support theme 2 (page 6 of the CCF): “To improve movement around the city centre and increase physical activity by promoting walking and cycling and encourage the use of public transport.” However, the CCF does not recognise the primacy of making the environment better for people on foot. It fails to show a network of walking routes. This detail is essential to encourage the transport mode which in policy is at the top of the hierarchy, and to show that the routes are fully viable. It should also be an essential driver for prioritising public realm improvements
- **movements from outside the area:** the CCF fails to consider movements by the various modes *into* the area. It does not assess the adverse impact of motor traffic coming into the area. It does not assess how to improve the routes into the city centre for the high number of people who walk to work. It does not consider how reducing the

number of vehicles coming into the city centre could enable bold decisions to be made about reallocating road space to encourage more walking and cycling.

- **addressing issues:** the CCF ducks movement issues rather than face into them. It promotes bus lanes and cycle lanes without facing into the issue of reallocating road space. It defers addressing car parking till a parking strategy that has yet to be produced.
- **specific schemes:** it fails to propose specific schemes in certain places to change the balance of road space use. Surely this document was *the* opportunity to put forward such schemes? Our detailed response (see below) cites examples of schemes that might have been proposed.
- **simplifying the highway network:** we support Aim 10 (page 13) of simplifying the highway network. The CCF says “This approach will be explored further .,.”, but makes no specific proposals. If the CCF was to be visionary, it could also consider more radical, perhaps longer-term, measures. Our detailed response (see below) cites examples of schemes that might have been proposed.

2.4 Public realm proposals could be more visionary and more specific

High quality public realm is important. People see high quality public realm when they visit other cities, and they expect to see improvements in Bristol’s city centre. We welcome the improvement proposals in the CCF, but we think they could be more visionary and more specific.

Visionary proposals could include the corner of High Street and Wine Street. The CCF includes a reference to this, but it could have made a virtue of the benefits of restricting the use of the highway, and promoted a visual demonstration of the potential public realm project to reinstate the missing quarter of the old city.

The public realm proposals need to be more grounded into the other parts of the framework. A starting point should be a network of primary and secondary pedestrian routes. Primary routes should have priority for public realm investment. The proposed public realm corridors are not all on primary pedestrian routes, eg Broadweir, and do not sufficiently cover north/south connections.

Where public realm improvements are proposed in the CCF, the nature of the proposal is often no more than half a dozen words. Some more detail is needed.

3 Detailed comments

3.0 Introduction

The unnumbered figure on page 5 of the CCF shows the adjacent areas covered by existing planning documents, but it does not show the extension of the area of the Temple Quarter Enterprise Zone into Redcliffe, including the CCF Tower Hill sub-area. Although the Temple Quarter Spatial Framework was written before the extension was agreed and therefore does

not cover Redcliffe, it is still relevant to say whether there are any planning policy implications due to the overlap.

3.1 Improved movement

3.1.1 Walking

- **Lack of walking network:** The CCF is deficient in that it does not map walking routes. The map on page 14 is labelled Walking and Cycling, but does not show walking routes ! It is not sufficient for the CCF to address walking solely via pedestrian priority areas and public realm corridors. For instance, the public realm corridors do not sufficiently cover north/south connections. The CCF should include a walking network, which should include arterial routes into the city centre.
- **Pedestrian Priority Area - Old City:** This has been designated a pedestrian priority area for some time, but not enough progress has been made. The Metrobus changes to the Centre have eliminated the St Stephen Street rat run, but cars still roam around for parking, vans still litter the streets, and there remains a constant trickle of traffic through Corn Street and Small Street because traffic restrictions have been stalled by the court's access requirements. It should be possible to overcome this – other cities have schemes that strike an appropriate balance between public enjoyment of traffic-free space and access requirements of local businesses and institutions. A TRO could make an exception for the Court's special access needs, and allow access for business deliveries in time windows at the start and end of the day. The CCF should commit to implementing this.
- **Pedestrian Priority Area – Bristol Shopping Quarter:** It is not clear what new proposals might be made. The designated area is already free of motor traffic, except for Penn Street which is proposed to be so if and when the Callowhill development is implemented. The Cabot Circus development and Broadmead BID have already brought public realm improvements. The CCF could indicate the nature of the proposal.
- **Pedestrian Priority Area – Temple Street:** We welcome the proposed realignment of Temple Street and its designation as a pedestrian priority area.
- **Routes between Temple Meads and the city centre:** more thought needs to be given to attractive walking routes between Temple Meads and the city centre. There is an existing waterside route on the south side of the river, which is inadequately waymarked. A new waterside cycle route is proposed by the CCF on the north side of the waterway and then through the proposed Assembly development towards Tower Hill. This could be a pedestrian route too.
- **Routes from the bus station to the city centre:** more thought needs to be given to attractive walking routes between the bus station and the city centre. The main opportunity is the walk through the two halves of St James Park. St James Park is designated in the CCF as a priority for public realm investment, and this should be extended to include the walking route from the bus station.
- **Other routes:** the Bristol Walking Alliance is making more detailed comments on specific walking routes, which Bristol Civic Society supports.

3.1.2 Cycling

- **Segregated routes:** we support Aim 3: Complete AAA cycle network - “...with the aim being to achieve fully segregated cycle routes in most locations.” However the CCF does not face into the implied reallocation of road space away from motor traffic, and until this is done the feasibility of segregated routes is not proven.
- **Types of route:** the map of cycling routes does not distinguish between types of route. Some routes are intended for fast travel, and some are not. Some routes are shared use, and are intended to continue as shared use. The map of cycling routes should distinguish between different types of route.
- **Consequences for walking:** cycle routes have implications for walkers. The cycling network should be set out on the same map as the walking network, and where they coincide should consider how both modes can be comfortably accommodated in the same space.
- **North/south cycle route:** the CCF rightly acknowledges the need for a good cycling route south from the Gloucester Road arterial route across the city centre towards Redcliffe Street and Victoria Street. The CCF recognises the missing links without facing into the challenges of resolving them – eg at St James Barton, Haymarket, and Bristol Bridge. The CCF proposes that a section of this high-demand cycle route cuts across Castle Park from Union Street to Bristol Bridge, but (1) it is not clear that this can be accommodated on the same route as a high-use pedestrian link, (2) cycle routes through parks should be avoided where possible because they tend to compromise the primary use of parks as places for leisure and relaxation, and (3) a quieter High Street/Wine Street route looks to be a preferred option.

3.1.3 Public Transport

- **Bus lanes:** we strongly support Aim 4: Complete the city centre bus lane network, and the new stretches of bus lane shown in the map on page 16, including Wine Street, Union Street, and Broadweir. And at the Triangle (which is outside the CCF area). The CCF does not face into the implied reallocation of road space
- **Buses round Broadmead:** we support the proposal to re-route buses in an anti-clockwise direction around the edge of Broadmead. It is not clear how buses, cyclists and pedestrians can all be accommodated though the gap from Broad Weir past the Castlemead building through to the inner ring road.
- **Nelson Street.** The Council now recognises the incompatibility between the high number of buses on Nelson Street (more than one a minute) and its designation as a primary route for of walkers and cyclists. But it is unclear how this will be remedied. It takes time and money to do a review of bus routes, and a review of Broadmead bus routes has only just been completed, triggered by the Callowhill development. The CCF needs to commit to a review of bus routes to add credibility to its aspirations for Nelson Street.

3.1.4 Other measures

- **Dependencies on measures outside the CCF area:** the CCF movement framework is dependent on measures that are yet to be published in the Bristol Transport Strategy (BTS), and we suggest that the CCF should be revised in the light of those measures once they are known. The CCF refers to Park and Ride, but not other measures to control traffic entering the city centre. It does not consider the impact of freight

consolidation, delivery vehicles (rising with internet shopping) and points of collection, road pricing and/or a parking levy, all of which could help enable the reallocation of road space.

- **Parking:** We welcome Aim 9: Parking strategy, because parking controls are important to making city centre streets and spaces attractive for those on foot. We await the promised parking strategy for Bristol. The CCF could make some specific points without waiting for the parking strategy. For instance, (1) the siting of the Fairfax Street/All Saints Street car park creates unnecessary traffic in quiet city centre streets, and the CCF should propose that it should be moved, (2) the quality of the environment in Rupert Street and Lewins Mead could be greatly improved with the removal of the Rupert Street car park. These would be consistent with reducing private traffic from the central area.
Specific schemes: the CCF fails to propose specific schemes in certain places to change the balance of road space use. Some examples of schemes that might have been proposed are:
 - make Haymarket one-way (away from the Bearpit). The newly-implemented ban on right turns from Baldwin Street helps to enable this. This would make space for a segregated cycle route, and improve the pedestrian route from the bus station to Broadmead and the rest of the city centre.
 - downgrade Lewins Mead or Rupert Street. Downgrading Rupert Street would improve air quality in one of the most polluted spots in the city, where many buses stop.
 - make High Street/Wine Street bus-, taxi- and bike- only. This would improve the pedestrian experience, and increase the level of activity in the area.
 - improve the walking route from Christmas Street to Christmas Steps. Currently it includes a stretch of unfriendly covered walkway through a 1970s development.
 - stop through-traffic from Old Market roundabout to Redcliffe roundabout, allowing filtered permeability for bikes. In the evening rush hour the roads approaching Redcliffe roundabout are plagued by queuing traffic, adding to air pollution.
- **Simplifying the highway network:** we support Aim 10 (page 13) of simplifying the highway network. The CCF says “This approach will be explored further .,.”, but makes no specific proposals. If the CCF was to be visionary, it could also consider more radical, perhaps longer-term, measures, alongside measures to reduce the volume of traffic coming into the city centre. For instance:
 - downgrade the lower part of the M32 to reclaim space, reduce the dominance of motor traffic, improve air quality, and reduce the severance between communities
 - replace Old Market roundabout/underpass with a cross-roads to reduce the severance caused by the inner ring-road
 - replace the Bearpit/St James Barton roundabout with T junctions, thereby improving the experience for the high volumes of pedestrians and cyclists passing through.

3.2 New development

- **Development layout:** we welcome the realignment of Temple Street. There does not seem much else new layout to comment on ?
- **Specific sites and developer interest:** where there are specific sites where developer interest needs to be attracted, more detail is needed.
- **Tall buildings:** we support the guidance given under Aim 14: Promoting appropriate building height. With its emphasis on “amplified height” rather than tall buildings, it takes

a more balanced approach than the draft Local Plan review and Urban Living SPD. We support the allocation of height to individual sites shown in Fig 4: Development form. In particular, we strongly support the proposal to keep the building height at the prevailing city scale close to the Old City, eg at the St Mary le Port site, and do not see the approval of a tall building on the ambulance station site at the opposite corner of the park as a valid precedent for the St Mary le Port site.

- **Focal buildings:** we support the proposed sites of focal buildings shown in Fig 4: Development form. “Focal buildings” do not necessarily mean tall buildings.
- **Mix of uses:** we support the proposals for variations of mixed use at different sites described in Aim 17 and Fig 5. We are unclear about the meaning of “The framework promotes improvements to student housing ... within the Old City and Lewins Mead sub-areas.”
- **West Broadmead:** the CCF assumes a continuation of the status quo in the amount of retail space. Given the threat to traditional retail, the CCF could consider alternative scenarios which would lead to a greater mix of uses in the area. This might include the Galleries.

3.3 Public realm

- **Public realm corridors:** Whilst we can see some value in prioritising for improvement the 9 sites in Fig 7 on page 28, we think the concept of public realm investment corridors as presented is somewhat flawed. The proposals should either be limited to particular sites, or, if they are based on routes, the routes should be revised in the following respects:
 - a starting point should be a network of primary and secondary pedestrian routes. Primary pedestrian routes should have priority for public realm investment. The proposed public realm corridors are not all on primary pedestrian routes, eg Broad Weir.
 - on a route dominated by motor traffic, improvement of public realm is of less value if the dominance of motor traffic is not also addressed, eg Baldwin Street.
 - the corridors do not sufficiently cover north/south connections.
- **Specific corridors:**
 - *A: The Centre to Cabot Circus* – see comments at 3.1.2 above re Nelson Street and buses, and 3.3 above re West Broadmead.
 - *B: Corn Street, Broad Weir, Frome Riverside* – see our comments at 3.1.1 above re Corn Street. High Street, Wine Street should be high priority for public realm improvement. We are not convinced that the junction of Broad Weir, Penn Street and Lower Castle Street should be a priority for public realm improvement – it is too dominated by traffic movements.
 - *C: Baldwin Street, Castle Park, Old Market Street* – we are a little unclear why Baldwin Street has been prioritised for public realm improvement. Whilst it is a major route, it is dominated by motor traffic, and there are no proposals to reduce the dominance and enhance the experience for those on foot. Moreover, there is only one potential development on the street that could provide a developer contribution to public realm improvement.

3 New development projects

- **OC01 High Street / Wine Street.** We strongly support both “The reinstatement of St Mary-le-Port street as a primary pedestrian axis linking St Nicholas Markets to St Peter's Church is a priority ..” and “the tightening of the junction at High Street and Wine Street offers an opportunity to introduce a focal building and exceptional public space.” “Focal building” does not mean a tall building.
- **OC03 St John's Court:** We strongly support development “... providing a mix of uses that help legitimise Tower Lane and Little John Street as public routes with improved links to Lewins Mead, St John's Steep and Tailors Court.” Not just improved links but improved public realm.

CCF Lewins Mead sub-area

1 Issues and opportunities

- **Movement vs human environment:** The CCF recognises the issues: “Issues:
 - High volumes of private vehicle traffic and bus movement along Nelson Street creating tensions between pedestrians, cyclists and vehicles
 - Tackling the canyon effect along Nelson Street and Rupert Street to create a more human scale environment.”

We support: “Opportunities: 4. Increase green infrastructure and street trees within Rupert Street and Lewins Mead to extend the recent enhancements associated with the Centre and Froomsgate Park”. But this is not enough on its own.

Something more radical needs doing with Rupert Street and Lewins Mead to make them acceptable for pedestrians. We need to face into the air quality issue, which is particularly bad on Rupert Street, where many buses stop. The roads need to be downgraded as a through route for motor traffic. The newly-implemented ban on right turns from Baldwin Street helps to enable this

2 Public realm and movement projects

- **Nelson Street** - See our comment in 3.1.3 above that the high bus use in Nelson Street needs to be addressed before “Recent improvements [are] extended to the junctions with Fairfax Street, Bridewell Street and All Saints Street to create a continuous good quality link to Broadmead for pedestrians.” Improved public realm is not feasible at Bridewell Street, Fairfax Street, All Saints Street whilst it is dominated by bus traffic, and cars cruising for parking.
- **Rupert Street and Lewins Mead** – the proposals here are vague and need more detail. The quality of the environment could be greatly improved with the removal of the Rupert Street car park. This would be consistent with reducing private traffic from the central area.
- **St James Park.** The Lewins Mead sub-area includes St James Park, but the Place Plan makes no reference to the “landscape enhancement” referred to in the main CCF document.

3 New development projects

- **LM01 Fairfax Street.** The siting of the Fairfax Street/All Saints Street car park creates unnecessary traffic in quiet city centre streets, and we would welcome a redevelopment that removes the car park.
- **LM02 St Johns Court, Nelson Street** We recognise that the recently announced redevelopment is a major opportunity to improve the public realm on Nelson Street. However the “opportunity to re-engage with the street by providing more active frontages ...” is limited by the narrow pavement, squeezed by the space for buses and the imminent cycle lane.

CCF Broadmead sub-area

1 Issues and opportunities

- **The future of retail.** We would expect to see in the list of issues and opportunities the threat to traditional retail and the opportunity of other uses.

2 Public realm and movement projects

- **Public realm enhancement.** Other than greening, the proposals seem vague.
- **Pedestrian connectivity.** We agree with the objective “3. Improve the pedestrian environment to increase connectivity with adjacent areas such as Lewins Mead, Old City, City Gateway and St Pauls.” But the proposals are vague and need more detail. For instance:
 - the north/south route for pedestrians and cyclists from Penn Street to Brunswick Square should be addressed, making the crossing of Bond Street better, possibly at the same time as the Callowhill Court car park is developed.
 - it is not clear how buses, cyclists and pedestrians can all be accommodated though the gap from Broadweir past the Castlemead building through to the inner ring road.
 - a more radical proposal could be to replace the Bearpit/St James Barton roundabout with T junctions, thereby improving the experience for the high volumes of pedestrians approaching Broadmead
 - the approach for pedestrians from Castle Park to Cabot Circus at the junction of Broad Weir and Penn Street could be improved.

3 New development projects

- **BM02 Galleries and BM02 (should be BM03) Merchant Street North:** Given the pressures on traditional retail, the possibility of uses other than retail should be explored in more detail.

CCF City Gateway sub-area

Calling it “City Gateway” emphasises its role of bringing motor traffic into town, not its place-making opportunities. We suggest a different name is used.

1 Issues and opportunities

- **Movement vs human environment:** The CCF recognises the issues: “Issues:

- Reconciling tensions between the strategic arterial route into the city, and promoting place-based development to provide an appropriate gateway into the city”.
- Noise pollution and air quality issues in relation to increasing the residential population.

We support ““Opportunities 9. Create a boulevard along Newfoundland Way to reinforce the transition from the M32 to the city centre.” But that is not nearly enough.

Something more radical needs doing to reintroduce a human environment. Building homes so near traffic noise and polluting vehicles must be questioned, unless the noise and air pollution are tackled. The CCF could include a radical proposal to downgrade the lower part of the M32 to reclaim space, reduce the dominance of motor traffic, improve air quality, and reduce the severance between communities.

- **Pedestrian connections:** The north/south pedestrian connection from Houlton Street to the public footpath through the new Moxy Hotel development to Wilson Street and beyond could be improved to reduce severance. There could be increased separation from traffic and more greening along the route.

2 Public realm and movement projects
No further comments

3 New development projects

- **CGO4 South of Newfoundland Circus** We support the building in front of the car park, but as mentioned above the proposals for the bottom of the M32 could be more radical.

CCF Tower Hill sub-area

1 Issues and opportunities

- **Movement vs human environment** The CCF recognises the issue: “Issues:
 - Severance from Old Market by Temple Way and Old Market roundabout.” It says under Supporting transport measures “Recent public realm investment associated with the Old Market roundabout has made significant improvements to crossing facilities. The key development sites within the area are expected to contribute further improvements to the walking and cycling environment, as well as ensure better connectivity to Old Market and the Temple Quarter Enterprise Zone”.
 But the improvements at Old Market roundabout are minor compared with the severance caused by the multi-lane inner ring road. A more radical proposal would be to remove Old Market roundabout.

2 Public realm and movement projects

- **Tower Hill.** We support the proposed segregated cycle route, but it needs to be improved as a pedestrian route too, being part of a route to Temple Meads station. Tower Hill would be a better environment for pedestrians and cyclists if through-traffic was not allowed from Old Market roundabout to Redcliffe roundabout.
- **Cheese Lane/Harbour Walkway Routes:** These are important routes from Temple Meads station, and we support them strongly. Consideration needs to be given to how

the space is allocated/shared between cyclists and pedestrians, especially on the narrower waterside section between Cheese Lane and Temple Meads, as it could be a popular route for pedestrians.

3 New development projects

No further comments

CCF Castle Park sub-area

The Society is disappointed at the lack of vision shown in this sub-area given its importance and role as a critical city centre public park, and the number of past masterplans, public consultation and input, and current development pressure. The surrounding area, demographics and the market are rapidly changing. Within a short time there will be a transformation in the number of residents who live within a 500 metre radius of the Park who require an upgraded green lung in the city centre. The Society suggests that the best course to take is to acknowledge that the Park's development will be organic and suggest specific development projects that could attract inward investment. The draft describes only some of the opportunities and omits to mention immediate development threats.

1 Issues and opportunities

- **Governance etc:** The issues and opportunities and objectives for Castle Park have been much discussed over past years, and the draft CCF provides a good summary, which we support. The issue is how to make progress with improvements. An important start would be to have a vigorous 'Friends of' group. Hopefully future new residential development on the edge of the park, and in Redcliffe, will facilitate that. The CCF suggests more than this: "a decision making body with responsibility for future investment and maintenance" – does this mean a semi-independent community trust ?
- **Boundary treatment:** We think the opportunity "Consider alternative boundary treatments to the water's edge to allow better visual connection" is a good idea. It might be possible to create 'viewing points', possibly with seats, by replacing the stone parapet with railings in selected short lengths. However this idea is not carried through to the proposals.
- **Raising income for parks:** the Council wishes to raise income to help fund parks, and Castle Park has more income-raising potential than most other parks. But of course this raises other issues, like the use of the park for events, which has spatial and other impacts. The CCF could refer to this.

2 Public realm and movement projects

- **Moat Walk:** the CCF suggests "an increase in the width of the path, and the addition of a segregated cycle lane alongside should be considered". We accept that Moat Walk is on a desire line from Castle Bridge to Broadmead, but we suggest that a segregated cycle lane across the middle of the park would compromise the primary use of the park as a place for leisure and relaxation. In any event the cycle route immediately south of Castle Bridge is narrow and shared-use, and will not be used by faster cyclists, so it would be inconsistent to continue the same route with a much wider path.

3 New development projects

- **CP02 Corner of Broad Weir and Lower Castle Street:** we support “the key objectives [which] remain to improve access that addresses both the street and the upper levels of the Park.” It is important to address the barrier to Castle Park from Cabot Circus, by providing an access to the Park from this corner that is obvious, inviting and direct. But we do not see how the development of the corner site could be compatible with the need to create a welcoming entrance, given the level difference.
- *Commercial development:* The CCF says “Development will depend on finding an attractive and viable solution ..” but we are sceptical that the corner site will be developed commercially. It does not seem attractive enough to a developer. It is at a place for movement, not for pausing. And there is no point in building something there that competes with the neighbouring acres of commercial floorspace. It might be better to realign Broad Weir a little to create some attractive public realm for people waiting for buses on the north side of Broad Weir. Public realm on the north side of the road would get more sun.

This site was included in the Central Area Plan as “an opportunity to create a new gateway into Castle Park from Broadmead/Cabot Circus”, and the site needs to be protected from development allocation if this is ever to be achieved.

- *Access:* We suggest that providing access to the park at the corner is likely to be difficult and expensive, because of the difference in height, and particularly difficult to make DDA-accessible except using a lift, which would be at risk of breaking down. There is an existing route that starts a short distance up Lower Castle Street from its lowest point at the corner of the park, and adopts what is probably the optimal route line into the park, given the difference in height. Users on foot have to climb a steep flight of stairs, and wheeled users have to access the route from higher up Lower Castle Street. The route goes through the area of the old playground and comes out on to the existing east/west walk/cycle route close to the park entrance from Castle Street.

The route is a natural route from Castle Bridge to Penn Street, and a natural route from the ambulance site to Penn Street. It could provide more footfall past the Vaulted Chambers, which might encourage a commercial use for it. If adapted for cyclists, it would reduce the need for cyclists to use Moat Walk, which cuts across the main section of the park.

Enhancements could include:

- (1) the route could have an eye-catching gateway where it starts from Lower Castle Street, so that people are drawn towards the park.
- (2) the route across the area of the playground could be made more direct and wider.
- (3) the route could be signposted from the existing east/west walk/cycle route.
- (4) (more ambitiously) a meandering ramped access up from ground level across the Broad Weir / Lower Castle Street site into the park, or a lightweight structure with a sloped ramp along the outside of the walls along back of pavement line on either of the roads until it gets to grade.

CCF North Redcliffe sub-area

1 Issues and opportunities

- **Through motor traffic:** we would suggest that an additional issue is the presence of through-traffic coming from the Old Market roundabout through to Passage Street and Counterslip, headed for St Thomas Street and onward to Redcliffe roundabout. It harms the liveability of the neighbourhood, especially in the evening rush hour. The aim should be to limit motor traffic to access-only.
- **Pedestrian route to Temple Meads station:** we would suggest an additional opportunity is to make more of the walking route from Temple Meads on the south side of the Floating Harbour to Counterslip, and from there on towards Castle Bridge and beyond.

2 Public realm and movement projects

- **Victoria Street** - The CCF proposes to improve Victoria Street for walking and cycling, which we support. It says: "To the south of the Counterslip junction there is significant potential to better use roadspace to improve the street for cyclists". But there is equally good potential *north* of the Counterslip junction: there is no need for the current central island and short stretch of dual carriageway.

3 New development projects

- **NR01 Fomer Central Fire Station:** we support the proposed realignment of Temple Street and the creation of a pedestrian route for Victoria Street to Castle Bridge, with associated public realm improvements.