

Bristol Local Plan Review

Comments from Cumberland Basin Stakeholder Group on the Local Plan's Draft Policies and related documents

Note 1. These comments are made following a read of the Local Plan's Draft Policies, the proposals for the Protection of Open Space and the draft Site Allocations document.

Note 2. Our interest is with the plans relating to Western Harbour and therefore comments focus on aspects relating to this part of the Plan.

1. All comments start from the point of making it very clear how difficult it is to make any detailed comment on these documents in the absence of the proposals for a reconfigured road scheme. This reconfigured road scheme, whatever it may look like, is clearly critical to any developments in the area.
2. We do not think it is sustainable that the developments indicated within the Local Plan can move forward at a different pace to that of the transport and road configuration issues. We believe therefore that it will be important to update the Local Plan again in relation to Western Harbour when the results of the consultation on the road system has been published. There should therefore be a further opportunity to comment on this part of the plan before publication and submission.
3. Assumptions seem to be made e.g. that development *will* include a reconfigured road system and that at least 2,500 homes will be built which suggest that someone already knows what the range of development opportunities are and yet we are still awaiting consultation on any alterations to the current road system and so far we, and our elected representatives, have been denied access to the Arup report which could shed more light on this. This aspect of secrecy is unacceptable.
4. Para 4.1.28 makes mention of the views of the gorge and the Suspension Bridge. However no mention is made of the views of the warehouses and the green land beyond in Ashton Court which we would argue is also of great importance to many and particularly those who use the harbourside for leisure. This makes it particularly important that the height of any development does not adversely affect these views. In this regard we remain sceptical as to which Place Principle will win out. Scale and design appropriate to City Centre location or responding appropriately to key views and landmarks. We believe the latter to be more important for this area and the document should say so.
5. Related to the above, it is necessary to comment on the notion that the Western Harbour area is a city centre location. No one can deny that it is close to the city centre, however it is also on the Western fringe of the city and as such is as much a city boundary space as it is a city centre space. For this reason it should not automatically be viewed as an area suitable for densities appropriate to a city centre area. The area is adjacent to the river and then the green of Ashton Court Park and beyond. This aspect of the area should be acknowledged. We are encouraged to see that Western Harbour is not specifically listed at the bottom of

page 55. However we think that there is too much space for ambiguity in the whole section here under the title "Locations for more intensive forms of development.

6. Also in the same paragraph mention is made of Underfall Yard, which we would fully support. However no mention is made of the youth and leisure activities that take place from the Avonquay space and we believe these to be equally valuable to the harbourside and indeed beyond and therefore worthy of inclusion for retention and development.
7. We are surprised to see no mention of the potential for the development of A Bond warehouse. We believe this to be crucial to the overall quality of any development in the area.
8. We note the comment made in para 4.1.29 which is understandable. This is presumably the reason for the very considerable enlargement of the area from that shown in CDS4. However we are alarmed to see that all the green space South of the river shown in the illustration that follows this paragraph has apparently been wiped out of existence in the map on p. 60 of the Open Space document. This leads us to believe that plans are already developed that removes this green space and no reference is made anywhere to substitute space/s. It also seems to run contradictory to the intentions indicated in para 10.4.
9. Relating to the above we see no mention of retaining, in its present place or elsewhere, the very popular cycle bump track on the South side of the river.
10. We are pleased to see that there is a commitment to the provision of adequate community facilities
11. Retained Policy BCS9 indicates that "Allotments form part of the city's green infrastructure; within the built up areas they will be identified as Reserved Open Space reflecting their community value". However, we note with concern that only 2 of the 5 allotment areas of the Hotwells and District Allotments Association plots are indicated on the maps within the Open Space Document. They should **all** be included and hold the same status.
12. As we have a member of CHIS within the CBSG we are aware of the comments made by CHIS in relation to Western Harbour and endorse their comments.