

I am a member of the Cumberland Road Stakeholders Group representing the Bristol Industrial Archaeological Society (BIAS), and Clifton and Hotwells Improvement Society. I am also involved with the consultation for the Local plan. I am submitting this report about the Western Harbour route change proposal on behalf of the BIAS since I am on the planning team and my involvement with this historic docks conservation area.

## 1. Comments about the engagement

This is an engagement rather than a consultation. It is only for four weeks rather than 6 weeks for a normal consultation. - Although the Council's Code for Consultation says a minimum of 6 weeks, it also states this should be extended at certain times of year. The HM Government Code for Consultation specifically references extending the date beyond the minimum where the Consultation falls over the Summer Break. Many Groups have been unable to arrange meetings until 11th hour (or not at all) due to the time of year. The Council do not appear to be following rules for engagement. The Council's Statement of Community Involvement says at paragraph 6 - Presenting options,

*"The aim should be to set out options that are possible in the way that specific development is carried out, including those suggested by the community that reflect the community's needs, ambitions and experience.....purely oral or written presentations should be avoided so that, wherever possible, options are also presented visually. This could include the use of three dimensional models and drawings. The current consultation relies on simple diagrams of new roads, and many roads missing or hard to identify. Without some attempt at computer visualisation of the completed schemes the public have no understanding of the final appearance of any of the options. There is no understanding of how the area will be transformed by new roads and new building so public response is uninformed. The consultation is a wasted opportunity. If a private developer offered any of these transformative proposals like this, it would not receive Council support.*

If this was intended as a formal consultation, it does not reflect best practice.

- a. Many are confused as the difference especially when so little needed information is given for such a huge project. It has been remarkably difficult/ impossible to get required information. This can be seen throughout this document.
- b. Drop in sessions only had boards based on the questionnaire, and there was no session where the officers gave a talk about the options.
- c. We understand the results will be discussed at a Cabinet meeting in November. Three "transformative" approaches to redesign the road network are given but one can choose a "do nothing" option theoretically thank goodness, but it is not really obvious. The timing is no doubt due to tie in with getting the results of the latest Local Plan consultation in November which launched a bigger area for Western Harbour, but still incredibly vague about what was planned and where. Clearly the road network had to be agreed before the Local Plan was agreed. The main aim appears to be to transform the wonderful City Docks Conservation area to become a housing estate, despite being on a flood plain. The whole questionnaire seems to push a new route rather than refurbish the current one.
- d. The biggest flaw is that one only has to give a postcode if responding on behalf of an organisation! This could make the results fraudulent if few people give a postcode or the wrong one (names do not have to be given)

## 2. Local Plan consultation (comments by Neighbourhood Planning Network meeting 9 July 2019

- development hinges on the road
- resident consultation on highway to be held soon
- need to protect key green space and open space by harbour
- flooding conversation needed
- looking back, maybe it should not have been in the local plan
- there could be potential
- No one could not explain how to get 2500 dwellings +500

**(Western Harbour first mentioned in speech in October 2017 by Mayor but no details. May 2018 Prospectus for Cumberland Basin to have 3,500 homes worth £1billion.** The ambitious figures appear in Bristol City Council's latest prospectus which sets out £1billion worth of investment opportunities in Bristol' According to the booklet, the Cumberland Basin - which has been renamed Western Harbour - has "the potential to provide 3,500 homes, with a gross development value estimated at over £1billion". The council is also marketing

the 20 hectare of "prime land" for commercial and leisure developments. With views of Brunel's world famous suspension bridge, the Avon Gorge, Bristol Harbour, and the open, green expanses of Ashton Court estate, the Western Harbour could be one of the most desirable development locations in the UK.. We are putting together a proposal that will tear down the old, ugly road network across the western end of the harbour, build a new bridge across the river at a lower point and develop the available land on both sides of the Avon, bringing more affordable housing to the city centre, extending the harbour as a residential area to the west." Potential investors in the Cumberland Basin are asked to contact the Mayor directly for information.

Local Plan CDS4 in February 2018 had been for 600 homes!).

Vastly increased area from February 2018 to May 2019- now creeps south of the New cut and totally across the Gorge

- Planners would not allow infill due to heritage objects
- simplification of road very hard to do and makes journeys complex
- 900 response to local plan. No one knows what changes will be made until November 2019. Plan will go to Government Inspector in April 2020 and adopted December 2020 after public inquiry.
- it is easier to develop an area where the council owns most of the land
- had not realised so many sites were needed for industries

With regard to this meeting, should the traffic engagement be going ahead with unconfirmed information about area and number of dwellings?

### 3. Asking for feed back

#### a. Flier delivered to 7,000 residences in Clifton and Hotwells 12 August 2019

*Have your say and **help unlock land for new homes, shops and green space.***

*Bristol City Council is asking for feedback on changes to the road network in the Western Harbour area, which could create a new city quarter, including new homes, shops and green space. The flier was restricted to a small area- Rownham Hill, Princes Buildings, Christchurch in Clifton to Goldney House to Ashton Gate. Not sure why it went as far as Wapping Wharf though, since none of the maps went that far.*

#### b. ASK Bristol newsletter 21 August 2019

*Bristol City Council is asking for **feedback on changes to the road network** in the Western Harbour area, which could create a new city quarter, including new homes, shops and green space. Please note we are asking for early feedback on initial ideas, this is not a formal consultation on options.*

*Three new ideas are being considered to create a simpler, less intrusive road network. These could unlock a mixture of new homes, retail and leisure development, plus high quality public open space and **new walking and cycling routes**. Your feedback will help to inform our next steps.*

#### c. <https://bristol.citizenspace.com/growth-regeneration/western-harbour/>

*We are seeking early feedback on some initial ideas for changes to the road network in the Cumberland Basin area, to enable a new city gateway called the Western Harbour. We are at an early stage in considering ideas and we would like your views on these early concepts. This is not a formal consultation on specific options which would come later if any proposals for significant redesign of the road network are taken forward.*

*The Western Harbour is a key area within Bristol's floating harbour. The Western Harbour has the potential to be a cultural hub for leisure and entertainment with its views of Brunel's world famous Suspension Bridge, the stunning Bristol Gorge, Bristol Harbour, and the open green expanses of Ashton Court. There is an opportunity to bring new life to this area, reflecting its historic significance as a key gateway to the city and investing in housing, business and green space.*

#### d. Comment

The first request confirms that the primary requirement is to unlock land to build new homes etc. The second request nine days later states that the changes to the road network could create new homes. Just where are the new walking and cycling routes? We are now reassured that this is not a formal consultation. The third confirms the primary requirement is to change the road network to possibly create a city gateway and to bring new life to the area. It talks about views. It no longer refers to leisure or high quality public space. Just what is the real point of the engagement? It should be consistent to maintain credibility. New housing does not reflect historic significance. This is the City Docks conservation area.

#### **4. Need for change- Investment required to keep current system in use**

**The feedback form states that present road system requires significant investment if it is to remain in use.**

- a. In June 2018, a letter from the Mayor to the Cumberland Road Stakeholder group stated it would cost £60 million to sort out problems with the waterproofing membranes under Brunel Way and the infrastructure!
- b. In May 2019, a team of officers and an Arup representative talked to the Cumberland Road Stakeholder group about the forthcoming engagement and asked for comments. They told us that it would cost £40 million to refurbish the bridge. They confirmed that keeping the structure would be an option. They confirmed they would present 3 options. Traffic growth was not built in since traffic may be reduced, but traffic to the Airport may increase. One needed the Portway to SW route to get to the Long Ashton Park and Ride. There were pinch points, hence the Eastern scheme. The risk profile meant more traffic, the more at risk of failure. If the scheme was expensive then one would need more development to pay for it. Arup stated that since it was a feasibility study then it should be released otherwise bad faith was created. Costings should be released. The Western Harbour development could not fund the transport scheme.
- c. The August engagement form confirmed it would cost £40 million.
- d. Comment: The stakeholder Group and local Councillor have tried since October 2018 to get a viewing of the Arup report. This would give more detail of the traffic flows, repairs needed, ten options, costings of all options. This was strictly a transport study so was to do with traffic flows, cars a priority since it was a highways study. If the Plimsoll bridge was not demolished there would be no housing scheme. Only Councillor Mark Wright and Paula O'Rourke (chief Scrutineer) have seen the report but they were not allowed to take notes. Freedom of Information requests have been avoided. Why is the Mayor's costing so high?

#### **5. Need for change- current system harms the visual appearance of the area.**

- e. The choice is between a bridge that works and keeps the traffic moving regardless of whether the bridge is open or not, and new housing. Because of ambiguities of the current local plan consultation, no one knows the style or height or location of the buildings, where the green space is. Currently there are a large amount of leisure pursuits in the Basin, many people walk around Entrance Lock and watch the boats go through, look at the docks artefacts. It is not agreed that the current system harms the visual appearance. All the new routes and the new buildings will harm the visual appearance- the western and the western hybrid have new roads ruining the views of the grade I listed suspension bridge from both the docks and the bridge, the eastern ruining the setting of the Pump House and the Merchants Bridge and the Nova Scotia and the Harbourside walkway. The new buildings will ruin the view of the grade II bonded warehouses. The new routes still need elevated roads to link to the Winterstoke Road junction!

#### **6. The Vision**

- a. Draft local Plan **at least** 2,500 new homes, workspace, up to 500 bed spaces of student accommodation, open space, community facilities, new walking and cycling routes on a larger area than in the previous consultation are planned
- b. Engagement: 2,500 new homes with a mix of types, sizes and tenures at densities and forms appropriate to achieving this figure. A mix of uses in addition to new homes, including workspace, student spaces and retail and leisure development
- c. Comment: Which figures do we believe? Where will they be located? The Inspector may not agree that 2,500 dwellings can be built here and would certainly want more detail.

#### **7. Existing Context**

- a. It is vaguely stated the main highways in the area can carry over 2,000 vehicles per hour during peaks.
- b. The map only shows peak hours in 2036, not 2019. There is no way to reference the current year against a date in the future so you could show if the forecast was for traffic to increase or decrease. The current year has been measured so why not show it?
- c. It would be good to show peaks for each route for the future so that one can show the difference that route will make instead of stating roads are busier (roads not stated).

#### **8. Assessing the Road Network**

- a. It is not acceptable that we have not been able to see the Arup scheme which gives details of 10 solutions including costings.
- b. The three proposed routes aim to prioritise to walking, cycling and bus networks. Cyclists mostly use the pavement by the side of the river, and pedestrians do not usually venture farther than the suspension bridge. They usually use the pavement by the side of the river since it is hard to cross the busy road unless they use the footbridge at the bottom of Granby Hill (which goes over

the elevated part of the Plimsoll Bridge and which may vanish). Pedestrian routes are not indicated on the maps so it is impossible to tell what happens to this bridge. How will a pedestrian get across the road? Similarly the Harbourside Walk may be difficult to access on foot, as may the Nova Scotia and the Underfall Yard. Similarly the A370 caters for commuter traffic, commercial traffic, holiday traffic and local traffic and has two lanes on each side. Cyclists will clash with pedestrians alongside the waterside walks.

- c. It appears to be forgotten that the design of the current bridge is very clever. The first priority is that river traffic should have the first priority due to the high tidal range of the river. When the bridge is open, the road traffic is diverted to different routes to keep the traffic moving. Merchants Road bridge always has to open, the Plimsoll Bridge only opens if the vessel is too tall. The Basin is a big holding area for boats. The officers have confirmed that the river traffic will always have first priority. The current route is a major traffic route for the A4 from Avonmouth to the A370 to the South West and Bristol Airport. If there is a major incident on the M5, emergency transport uses the A4. Traffic already backs up on the A4. It supports commuter traffic, commercial traffic, holiday traffic and local traffic. There is already a separate bus and taxi lane for inward A4 traffic to Bridge Valley Road where there is only one lane. More traffic is added to the A4 at the Bridge Valley Road traffic lights.
- d. It is accepted that traffic would result on a reduced capacity for each route but amount not specified! The figure has clearly been calculated so why not quantify it? Do not fix a system unless broken! This is a major traffic route!

#### **9. Potential impact on environment and heritage assets**

- a. only mention historic setting of suspension bridge.
- b. Nothing about City Docks conservation area and Underfall Yard, docks artefacts and bonded warehouses and settings of listed buildings, listed harbour walls
- c. No mention of flooding
- d. No mention of existing green space
- e. no mention of heritage
- f. Nothing about Clifton and Hotwells conservation area
- g. No mention of Avon Crescent, Pump House and Nova Scotia, Sylvia Crowe landscape, walkways along Cumberland Basin, Windsor Terrace, Hotwells

#### **10. Existing Road Network**

- a. One should be allowed to see Arup report costings. They should not be secret. It is doubtful that condition surveys are needed to enable better use of the elevated structures since they are so efficient. It just needs maintaining better. £40 million seems rather expensive. Maintenance costs should not be a great deal considering the figures I have seen for 2015. All we are told is that waterproofing membranes need attention as do the traffic lights.
- b. Failure to create opportunities for new housing or growth, business, should not be a weakness! This is a destination to watch the leisure opportunities and look at the heritage, the locks, the boats, balloons, the views and the 1849 Brunel Swivel Bridge being restored to turn again and used as a footpath across the lock. Green space should not be destroyed.
- c. The bridge is only 55 years old. It is not outdated. It is a simple structure and only takes 1 minute to open in addition to closing the roads to let the boats go through. It has the least impact on the local area, people, tourists and traffic. There are no real weaknesses. This system works. It can not be improved and is far better than all the proposed new road networks. It just needs maintaining.
- d. Traffic flows for 2019 should be given as well as for 2036

#### **11. New Approaches**

- a. The map is atrocious for all the schemes. Road names are not given, roads are missing especially on the island. What has happened to Ashton Avenue? How does one get to B Bond? How does one get to the Brunel Swivel Bridge? It is not always known whether roads are one or two lane. How does one know where green space is?
- b. Will the footbridge at the bottom of Granby Hill be left standing? The questionnaire states that all elevated bridges will be demolished. How does one cross the new roads?
- c. We need information about which routes work better and how walking and cycling can be segregated from motor traffic. With the level of information provided, the public cannot understand critical matters for example, the effect of each of the proposals on nearby communities, how one gets to and from home when the road has been removed, will rat-runs be created?

- d. There are no costs for any of the schemes. Surely one should be able to use cost as a deciding factor- clearly not the only factor. There appears to be very little hard fact to help decide on which route to go forward
- e. Wider transport interventions, such as improvement of the route between the M5 and the South Bristol Link Road would reduce traffic demand in the area but **were not considered as part of the study**. Such interventions will be considered as part of a transport study for the area being commissioned by West of England Combined Authority (WECA). This seems a very strange statement to make. Local people may want to go further afield on their own transport, just as much as non-local people may want to go into Bristol. One day there will be an extra station at the Portway park and ride. One day one will be able to travel by train to Pill and Portishead to Bedminster and Temple Meads.
- f. All lose the resilience of the current system.
- g. Highways should stay out of cities. Through traffic should not be moved further into Bristol.
- h. None improve the walking or cycling experience and much green space is lost

## 12. Western Approach

- a. The new route with two lanes in each direction crossing the Gorge going from the base of Windsor Terrace would have a massive impact on the river and the historic setting of Clifton, Hotwells and the suspension bridge. The Clifton and Hotwells Character Appraisal describes this view as being of international renown and area being of outstanding interest and national significance. To build a new road with all the junction problems on both sides of river and so close to the bridge would be a total disaster.
- b. No projected traffic flows are given so it is impossible to check the difference in traffic flow this would cause
- c. The traffic lights on the bridge would cause delay problems to a major route
- d. There would have to be two swing bridges to maintain to let the boats through! If it is a low bridge it would require opening whatever size boat came through. The current Plimsoll Bridge with generous clearance allows a lot of the smaller boats to pass through without requiring a bridge-swing so less traffic disruption. So clearly, do nothing seems attractive! keeps the heavy through traffic further away from the inner city (and Avon Crescent)
- e. Maintenance of the bridges would be very difficult and the pintle and mechanisms covered in water half the time. The mechanism of the Plimsoll bridge is too high to get flooded
- f. The crossings are on tidal water. The traffic would be backed up the Hotwell Road instead of having an alternative route to go like there is now.
- g. We do not understand how the existing roads in Hotwells will have less traffic
- h. We do not understand how traffic from Clifton is able to get to Winterstoke Road or the bonded warehouses since traffic is relocated. How do deliveries take place? How do the dock staff get to the docks from Underfall Yard. How do residents get to Aston Avenue?
- i. What happens to the land north of Cumberland Basin Road Houses?
- j. There will be an increase to traffic on the Merchants Road and Avon Crescent since there is no link from Spike Island as the Plimsoll Bridge has gone. A well used Harbourside walk will be ruined.
- k. Avon Crescent is a narrow grade II listed terrace and currently one-way. It can not cope with more traffic
- l. There are no strengths to this scheme. It will strangle the area with traffic going from A to B when it is currently a much used destination making it harder for tourists, cyclists and pedestrians to enjoy
- m. The Western option encroaches into south Bristol, over the railway line and affects the natural environment. from Avonmouth or Ashton direction. There is the loss of at least a section of the Towpath, Cycle Route 41 and likely large swathes of the green space running between Sylvia Crowe's elevated landscaping / the Metrobus lane and new bridge.
- n. There is not enough room for a railway line, a 4 lane road, and a cycle path on the west bank- which is on the flood plain.
- o. The Cumberland Basin can no longer be used as a gathering area for boats waiting to go through the entrance lock since the crossing area is on tidal water and so may need to open during the rush hour.
- p. Traffic into / out of Clifton Village - would Granby Hill, Joy Hill and the hills near Holy Trinity become rat runs for local traffic? None are appropriate for heavy use. It is hard to understand how the roads in Hotwells can be reduced in width!

## 13. Eastern Approach

- a. Eastern option will carve Hotwells in two, and would be an act of vandalism almost on the scale of the 1960's destruction of Hotwells. Would need to solve pinch points at the Nova Scotia.
- b. Notice how the proposed new road would cut straight through the Riverside Garden Centre & Cafe, which has been a successful business for the last 30 years.
- c. There will be a hugely expensive new bridge across the New Cut.
- d. It is confusing that a strength would be a safe mooring area to avoid opening the bridge during rush hour. Surely this is what the Cumberland basin has been doing for the last 210 years in combination with the Entrance lock? - The Plimsoll and Junction bridges can not be opened Mondays to Fridays (except public holidays) between 7.30am to 9am and 4.30pm to 6pm. They might need to keep the bridges closed 30 minutes either side of these times as road traffic has priority.
- e. Merchants Road Bridge would be widened to 4 lanes rather than 2! Currently it only takes traffic going along the Cumberland Road to get to the south east avoiding the centre. The flood gates are here. A well used Harbourside walk will be ruined. Trade at the listed Nova Scotia and the Pump House will be ruined by the extra traffic.
- f. The scouring of the docks which is done by the Merchants Road swing bridge may be affected.
- g. Avon Crescent is a narrow grade II listed terrace and currently one-way. It can not cope with more traffic. It is always the first area to get flooded. Where is the resilience if the main road is flooded! It does make sense to have elevated roads!
- h. The setting of C bond will be spoilt.
- i. The Greville Smyth Park will also be cut in two. The Sylvia Crowe landscaping was given to Bristol to mitigate some of the loss of space caused by the road in 60's. She's a nationally important Landscape Architect and her work should be protected.
- j. All the traffic that is going between the A4 and A370 has to go through Hotwells! This is ridiculous. Hotwells Road has enough problems already.

#### 14. Hybrid Approach

- a. This is the worst option since it combines the disadvantages of both schemes- effect on nationally important views, Merchants Road being doubled in size, Riverside Garden being trashed, Avon Crescent being ruined, three new bridges, Environmental damage, increased journey times.
- b. The Hybrid option encroaches into south Bristol, over the railway line and affects the natural environment. from Avonmouth or Ashton direction. There is the loss of at least a section of the Towpath, Cycle Route 41 and likely large swathes of the green space running between Sylvia Crowe's elevated landscaping / the Metrobus lane and new bridge. There needs to be an elevated section to get over the metro bus route and Winterstoke Road.
- c. The most expensive scheme

#### 15. Connected Projects

- a. We now find out that there will be a Harbour Review. What is it and why was it not done when the Local Plan was considered? The 2015 Central Action Plan Policy BCAP41: The Approach to Harbourside was scrapped and incorporated into the Local Plan- yet to see the results of the consultation. Why is there yet another review- it has not been announced.
- b. I understood there was another round of consultation for the Local Plan in November before being submitted to the Inspector
- c. The Air pollution map of Bristol only has one red dot just by the roundabout by Trinity. There is a green dot by the school on Hopechapel Hill. There are no dots of any colour by the Plimsoll Bridge. The last air quality consultation only queried about diesel.
- d. It will be interesting to look at the Tidal Risk Strategy. Why build houses on a flood plain?

#### 16. Conclusion

This exercise has been an eye opener. The alternative options to the current scheme which are really offered to give the opportunity to build lots of houses and ruin the conservation areas as well as to spend lots of money to replace a system that works well are appalling and none work. It is not acceptable to put forward schemes which have inconsistent information and poor quality plans. It is impossible to work out how to get onto the new routes, and off them, how to cross by foot. The new schemes are less resilient when the bridge needs to be closed to traffic, and one gets longer journey times on this major route. The Local Plan will not be ratified until December 2020 so this scheme is a pipe dream as no one knows anything about what kind of housing, and how much, and where would be allowed

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