

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

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

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

The three city centre BIDs in Bristol, Bristol City Centre BID, Redcliffe & Temple BID and Broadmead BID, are operated by Destination Bristol trading as Visit West, the Destination Management Organisation for the West of England: [About Us - Visit West](#)

### **Bristol City Centre BID**

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

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

The Business Plan can be read here: [Business Plan 2022-2027](#)

### **Redcliffe & Temple BID**

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

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

The Business Plan is available here: [Business Plan - 2021 - 2025](#)

### **Broadmead BID**

Broadmead BID commenced its fourth term in November 2018. Each BID term invests £1m in Broadmead.

The Broadmead BID mission statement is: We work to support retailers, helping drive footfall and deliver high standards in all areas. We deliver more value than the BID levy. The BID operates with four strategic themes: Marketing, Clean and Welcoming, Business Support, Safety.

The current Business Plan is available here: [BID-Business-Plan-2018-2023](#)

This will be updated in Summer 2023 prior to the renewal ballot in September 2023.

## Why we are responding

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

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

The proposed Local Plan Policy Text is noted in blue with our response below each policy statement in italic black.

For any questions regarding this submission please email [tom@redcliffeandtemplebid.co.uk](mailto:tom@redcliffeandtemplebid.co.uk)

### **Draft Policy H1 and AH1: Housing Need – no comments for submission on the policy text**

#### **Draft Policy NZC1: Climate change, sustainable design and construction**

Minimising energy demand through high standards of energy efficiency, and maximising on-site generation of renewable energy (see Draft Policy NZC2: 'Net zero carbon development - operational carbon').

Minimising embodied carbon and making efficient use of natural resources (see Draft Policy NZC3: 'Embodied carbon, materials and waste').

Ensuring all development is adapted to changes in the local climate over the lifetime of the scheme (see Draft Policy NZC4: 'Adaptation to a changing climate').

For major non-residential development, a BREEAM assessment will be required. A BREEAM 'Excellent' Rating will be expected.

For residential or mixed-use development consisting of more than 100 residential units, a BREEAM Communities assessment will be required. A BREEAM Communities 'Excellent' rating will be required.

*The BIDs support the city's net zero ambitions and are actively working with the council and our levy payers with efforts to reach net zero. The Redcliffe & Temple BID's Sustainability Commitment outlines the work this BID will do over the next three years – [Sustainability Commitment 2022-2025](#). The recently updated Bristol City Centre BID Business Plan now includes statements regarding the support we will provide to businesses to help them reach net zero. Finally, the new Broadmead BID Business Plan will be published in Summer 2023 and will similarly outline measures the BID will take to support businesses with their net zero ambitions.*

*We support the expectation that "Excellent" energy efficient building practices are required for major non-residential developments. We will continue to promote developments that excel in this respect and highlight good practice where relevant. We note that more support will be needed to help businesses and landlords of existing office stock which are to be retrofitted to meet new standards.*

Design which is sufficiently flexible and adaptable to enable changes of use or layout and facilitate future refurbishment.

*We encourage design to be flexible to change and we especially support buildings that can retrofit active ground floor uses and increase sustainability measures. Many city centre streets currently have too few active ground floors; active frontages playing a key role in creating streets with vibrancy and that are safe and welcoming for people to dwell and enjoy.*

Forms of development which make efficient use of land and encourage walking, cycling and the use of public transport instead of journeys by private car.

*We are keen to support the council's aims to reduce car use in the city and increase use of sustainable modes. We know that many of our levy payers support this aim and that the office sector and night-time economy sectors are particularly keen to see an improved public transport network.*

*Could the word 'encourage' be replaced with 'encourage **and enable**' in this sentence: encourage walking, cycling and the use of public transport?*

*We would support an increase in wayfinding and signage throughout the city centre to enable efficient and inclusive active travel for workers, residents, and visitors to the city.*

*We would like to stress the importance of timely and proactive consultation with businesses in various formats. This will help to understand businesses needs and to engage them with planned changes to alleviate concerns and misinformation.*

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

Development should seek to eliminate the need for cooling systems throughout the lifecycle of the development and, where cooling systems are required, minimise their capacity and energy consumption in accordance with the following steps:

Minimise the amount of heat entering buildings during warmer months through orientation, form, shading, surface finish, glazing design and insulation; then Minimise internal heat generation through energy efficient design and specification; then Maximise the use of passive ventilation to manage internal temperatures; and then Having minimised the need for cooling, meet any residual requirement through energy efficient mechanical ventilation and active cooling systems.

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

#### **Draft Policy NZC4: Adaptation to a changing climate**

Development should be designed, through its layout, form and massing and the use of green/blue infrastructure, to minimise climate change risks through measures including: Minimising the overheating of buildings; Reducing the urban heat island effect; Providing comfortable external spaces and internal refuge sites in hot weather; Conserving water supplies; and Minimising the risk and impact of flooding.

*We support the desire for developments to include comfortable external spaces. Our levy payers are particularly keen that appropriate seating areas are created together with green space throughout the city centre for people to use and enjoy at all times of day. We believe this will be key to encouraging people to visit the city centre for both work and leisure and will take on further prominence as the number of residents in the city centre increases.*

*Opportunities to install seating and greening interventions are available on Bristol City Council land, but we recognise that landlords with external space will also be key to achieving this goal. This is a new priority for Bristol City Centre BID and has consistently been highlighted as a priority for the Redcliffe & Temple BID, as demonstrated in our [Green Infrastructure Action Plan](#).*

*We would like to see a process developed whereby businesses and residents can suggest locations for Parklets and new social spaces in the city: [Parklets | Hackney Council](#)*

*We note the recent publication of Lambeth Council's Kerbside Strategy which may act as a useful template for Bristol to review its use of public space on the kerbside: [Lambeth's Kerbside Strategy](#)*

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

*Finally, we note that community engagement by developers could be improved, and a basic set of standards developed. We observe that many consultation events/sessions have very low attendance and are usually displaying the finished design rather than co-designing with the community. The [Scottish national standards for engagement](#) and [place the standard toolkit](#) may act as a starting reference point.*

### **Draft Policy BG1: Green Infrastructure and biodiversity in new development**

Development proposals will be expected to incorporate appropriate multifunctional green infrastructure and provision for nature.

The provision of green infrastructure in new development should:

Integrate green infrastructure into the design of new development including features such as green roofs, living walls, green decks, or water features linked to SuDS;

Integrate features which support nature and encourage wildlife such as swift bricks and other nesting assistance, hedgehog holes and other wildlife movement features, accommodation for pollinators, and wildlife friendly landscape treatments;

Retain and incorporate important existing green infrastructure such as trees (Policy BG4), hedgerows and water features;

Take the available opportunities to deliver multifunctional benefits such as habitat creation, flood protection, water quality, recreation, food-growing, improved air and water quality and reduced urban heating;

Take available opportunities to connect to, or enhance the integrity of the Nature Recovery Network and wider ecological networks;

Provide appropriately for recreational access and use; and, Enhance opportunities to access nature, through connecting public rights of way and extending access to active travel links where possible.

Where green infrastructure is provided it is expected that provision will be made for its long-term management and maintenance. New development should demonstrate through a Green Infrastructure Statement how it will address these provisions. Major development proposals will be expected to use appropriate standards such as Building with Nature to ensure that the nature conservation provisions of this policy are met.

*We support the desire to see increased Green Infrastructure within the city centre, as noted above. We would like to see this policy text enhanced to add more strength and create more balance on mitigation against climate change as well as including a positive impact on health and well-being, active travel, mitigation against the urban heat island affect and sustainable drainage solutions to combat flood mitigation.*

## **Draft Policy BG4: Trees**

The provision of additional and/or improved management of existing trees will be expected as part of the landscape treatment of new development.

The size, species and placement of trees provided as part of the landscape treatment will be expected to take practicable opportunities to: Ensure that any new streets created as part of the development are tree lined; Assist in reducing or mitigating run-off and flood risk on the development site; and Increase canopy cover and assist in providing shade and shelter. Proposals will be expected to set out appropriate measures to secure the long-term maintenance of newly-planted trees.

*We support the desire to see additional tree planting in the city centre, we recognise the benefits additional trees will bring including heat resilience, shading canopies, flood mitigation and visual appeal.*

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

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

Proposals which are adjacent to, or contain, waterways will be expected to:

Conserve and enhance the nature conservation value of waterways and adjacent land, including both habitats and species, and deliver biodiversity net gain (see Draft Policy BG3);

Maximise opportunities to conserve and enhance the sustainable urban drainage functions of waterway and banks, and deliver additional flood resilience measures as appropriate;

Protect and enhance the water quality of the water spaces and surrounding environment;

Maintain, enhance and create suitable, high-quality publicly-accessible green infrastructure for walking and cycling;

Complement existing and proposed waterside green spaces;

Avoid the loss of open waterways through culverting, piping, or enclosure by development and where feasible and viable, re-open existing culverted, piped or covered waterways; and

Enable long-term safe access, stewardship and maintenance of waterways and watersides.

Development on or adjacent to the existing quayside walkways shown on the Policies Map will be expected to retain and, where appropriate, enhance a continuous and accessible route.

Development on or adjacent to the proposed quayside walkways shown on the Policies Map will be expected to provide or contribute appropriately towards a continuous and accessible route finished to a high standard of design including, where practical, seating and appropriate landscaping.

Buildings lining existing or proposed quayside walkways will be expected to have active frontages onto the walkway where feasible. Development that would be harmful to the amenity or accessibility of an existing or proposed quayside walkway will not be permitted.

*We support the desire to maximise the health of our waterways, especially Bristol's harbour, one of our finest assets. We would like to see more be done to connect people with the water via seating*

*and public realm improvements by the water edge, for example at Welsh Back, The Grove Car Park (Prince Street Bridge) and Temple Back East, (Museum Street, while outside of the BID area, would be another obvious city centre location for intervention). We support active frontages on the quayside and hope that future refurbishment/redevelopment of key city centre office blocks includes active frontages (for example on Temple Back East).*

*We support pedestrian access along the water edge and would like to see additional signage to clarify access (especially from Redcliffe Quay to Temple Quay), we support the ask for new developments to maintain and enhance this access.*

*We would also support the addition of nature and wildlife habitats to the harbour. Floating reedbeds and habitats would be a useful and educational addition to the harbour and the BIDs would be especially keen to support this approach in the sections of harbour between Welsh Back and Redcliffe Quay and between Castle Park and Finzels Reach. We note the designation of the section of the floating harbour between Temple Meads and Redcliffe Bridge as a Wildlife Corridor and would welcome more interventions to improve this corridor to reflect this designation.*

*We would like to see a decision made regarding the future of the Seeds of Change Barge currently docked in this location, the BIDs have offered our support to a project to bring this back into use.*

**Draft policies FS1, FS2, FS3: Food growing and sustainability – no comments for submission**

**Draft Policy SSE1: Supporting Bristol's centres – network and hierarchy**

Retail development, offices, leisure (including food and drink), entertainment and night-time uses, arts, culture and tourism use will be primarily located within or, where appropriate, adjoining the centres in the identified network and hierarchy serving Bristol.

Centres will also be suitable locations for community uses including surgeries and public service facilities. Light industrial or small-scale distribution uses may also be appropriate in centres where they would contribute to their function and diversity.

Development will be expected to be of a scale and intensity appropriate to the position in the hierarchy and to the character of the centre.

Uses which contribute to maintaining the vitality, viability and diversity of centres will be encouraged. Active ground floor uses will be maintained and enhanced throughout the centres.

New residential development which makes positive use of upper floors of properties and on underused and vacant space away from commercial frontages will be encouraged within centres.

*As mentioned above we support active ground floor use and would like to see an increase of active frontages on a number of key streets in the city centre: Rupert St, Lewins Mead, Baldwin St, Broadweir, Victoria St, Temple Back East.*

*Bristol City Centre BID and Broadmead BID would welcome the council's support to create secure cycle parking in the city centre i.e. within a locked unit. This is currently lacking and contributes towards high levels of bike theft in the city centre and suppressed cycling levels due to fear of theft. Data from Avon and Somerset Police found 154 bikes have been reported stolen in Broadmead in the last three years with a further 658 bikes reported stolen in the wider city centre in the last three years.*

*Data re fear of bike theft is available here: [Summary of our 2021 survey – Bristol Cycling Campaign](#)*

*We support the proposals to see more residents living in the city centre, we note the importance of community amenities and infrastructure to support an increased population. These amenities should*

include but not be limited to healthcare, education, sport and leisure, play, green space and fresh food.

### Local Centres and Parades

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

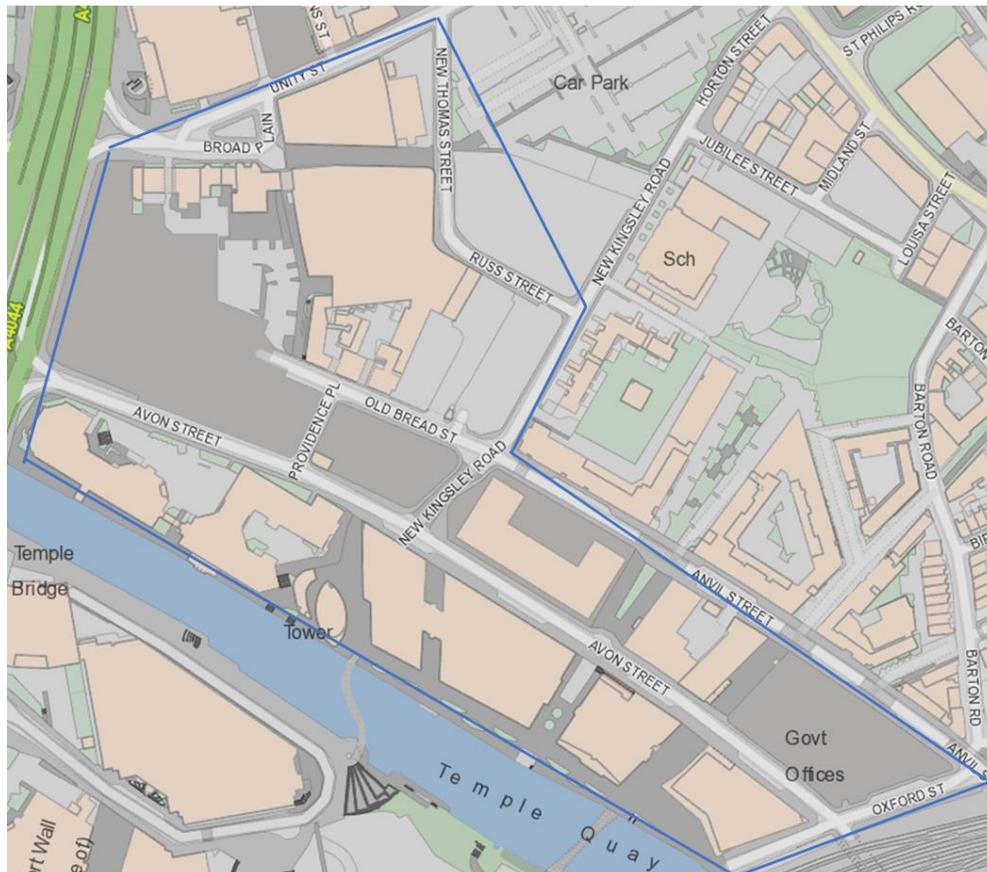
Premises in this area are already playing a key role in servicing the increasing number of people living and working in this area, this trend will only continue in coming years.

Premises located here as of January 2023 include: 5 cafes, 2 hotels, 1 deli, 1 pub, 1 home furnishings shop, 1 cycle shop, 1 restaurant, 1 supermarket and 1 outdoor equipment shop.

Could this be considered as an additional area of the city centre network under this policy SSE1?

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

Map on the page below:



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

Centres will be the focus for hospitality, evening and night-time economy, culture and leisure uses. Development proposals that protect, promote, diversify and revitalise these uses will be encouraged

where they contribute to the vitality and viability of centres and Bristol's evening and night-time economy.

New evening and night-time economy uses will be expected to ensure they are neighbourly, having regard to the character of the centre where they are proposed. Larger and busier centres will be the focus for larger scale hospitality uses and night-time uses. Evening and night-time uses may be appropriate in other locations where they cannot be accommodated in centres because of their scale and/or operational impacts.

Appropriate proposals which provide outside hospitality space and contribute to the animation of public spaces will be encouraged. Agent of change Proposals for residential development that could put at risk the continued use of existing evening and night-time uses, including music venues and clubs, are subject to the agent of change principle (Draft Policy HW1).

*We support a vibrant and mixed night-time economy in Bristol city centre. Opportunities for new late night venues should be supported as part of the local plan. Venues should be protected when applications for residential properties are being considered, city centre living is celebrating the eclectic mix of businesses. We will continue our ongoing work with Bristol City Councils Nighttime Economy Advisor celebrating and supporting the cities night time economy whilst also ensuring a safe night out can be had by all. For more info on our work see: [Protecting - Bristol City Centre BID](#)*

*We support proposals for hospitality venues to use space in the carriageway for well managed outside seating provided that appropriate pedestrian and blue badge access is maintained.*

#### **Draft Policy SSE5: Temporary Uses in Centres**

Proposals for the temporary use of vacant buildings or sites within centres will be supported, where these would contribute to an attractive and vibrant environment for residents and visitors.

Proposals should demonstrate that: Future development proposals would not be prejudiced; The local character and amenity of the surrounding area would be enhanced; Amenity of nearby residents would be safeguarded in relation to noise, waste collection and impacts from other potential pollution; and There would be no unacceptable traffic conditions or obstructions to pedestrians or cyclists.

Proposals for the temporary use of vacant sites for car-parking will not be acceptable. Development in areas of growth and regeneration should identify opportunities for creative and innovative meanwhile use of sites in early phases of development.

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

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

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

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

## **Draft Policy SSE6: Retaining and Enhancing Markets**

Proposals for new street or open markets will be encouraged where they would be beneficial to local shopping provision and would support the vitality, viability and diversity of existing centres.

Proposals for permanent markets or market-related development should have regard to: The availability of storage facilities for market stalls and associated equipment; and The availability of market trader facilities, such as toilets and other essential hygiene facilities; and Provision of an appropriate level of safe, secure, accessible and usable parking for trader vehicles; and The amenity of the area.

Proposals involving the loss of existing market sites will not be permitted unless it can be demonstrated that there would be no harm to the range, choice and diversity of market sites in the locality or city.

*Markets taking place in the city centre should complement rather than detract from the offerings of city centre businesses and specifically should take into account the food and beverage offer of businesses nearby.*

## **Draft Policy SSE7: Provision of public toilets**

Major developments that are open to the public should provide and secure the future management of: Free, publicly accessible toilets suitable for a range of users including disabled people, families with young children and people of all gender identities; and Free 'Changing Places' toilets.

Toilets and changing facilities provided should be clearly identifiable and located at readily accessible parts of the development which facilitate public access. Public toilets will be a suitable use where planning policies require or encourage the provision of active uses or frontages.

*We support the addition of more well-maintained public toilets in Bristol City Centre, we know from conversations with levy payers that this is a key issue for the city, especially for women and vulnerable people. The consultation prior to the publication of the Redcliffe & Temple Green Infrastructure Plan indicated that there is limited awareness of the city's Community Toilet Scheme, especially for visitors to the city who are unlikely to go onto the Bristol City Council website to look for such a scheme – we would like to see an appropriate level of funding allocated to business who participate in the Community Toilet Scheme.*

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

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

## **Draft Policy DC A: Delivering well-designed, inclusive places**

New development in Bristol should create or contribute to well-designed places. To be considered well-designed, development will be expected to:

- Deliver high quality, beautiful, safe, healthy and sustainable buildings and places;
- Be liveable, providing a safe, healthy, high-quality environment for future occupiers;
- Be neighbourly, safeguarding the amenity and sustainability of existing development;
- Be inclusive, providing for equality of access and opportunity in its layout and design.

Development that is not well-designed will not be permitted. Consistent with national guidance and any relevant local design guides / design codes, development will be expected to demonstrate how

it will achieve good design, taking account of the ten characteristics of well-designed places as set out in the National Design Guide:

Context – enhances the surroundings. Identity – attractive and distinctive.

Built form – a coherent pattern of development.

Movement – accessible and easy to move around. Nature – enhanced and optimised.

Public spaces – safe, social and inclusive. Uses – mixed and integrated.

Homes and buildings – functional, healthy and sustainable.

Resources – efficient and resilient.

Lifespan – made to last.

New development should enable the delivery of permanent and temporary public art and other cultural activity.

Further design guidance relating to specific locations, including designated areas of growth and regeneration, will be set out in design codes, masterplans and spatial frameworks.

*We support well designed buildings and developments but are not experts on the design and architectural quality of the buildings themselves. Our particular focus would be on the creation of 'Healthy Streets' and assessment of developments and streets against these criteria, see [Healthy Streets.com](https://www.healthystreets.com).*

*The ten Healthy Streets Indicators are as follows:*

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

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

#### **Draft Policy DC B: Advertisements**

Proposals for advertisements will not be given consent where they would have an unacceptable impact on amenity or public safety. An advertisement will be considered to have an unacceptable impact on amenity where it would:

Create or reinforce an incongruous feature in, or result in a negative visual impact on, its immediate neighbourhood;

Result in harmful clutter or visual commercialisation of residential areas;

Detract from the character or setting of any feature of scenic, historic, architectural, cultural or similar interest;

Be unduly prominent in medium or long-distance views;

Cause a noise or other nuisance; or Result in a negative impact upon residents' living conditions by reason of its siting or illumination.

Advertisement proposals of all types will be considered harmful to public and road safety where they would: Obscure views into an area, reducing natural surveillance; Create an unwelcoming sense of enclosure; Obscure safety cameras; Unsafely reduce natural or street lighting; or Create visual distraction which would be harmful to the attention of drivers or the ready interpretation of road signs, traffic signals and visibility of junctions.

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

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

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

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

**Development locations and allocations – no comments for submission**

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**End.**