



# **The Whitehouse Street Regeneration Framework**

**Response to the Formal Consultation  
February 2023**

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## **Introduction**

The formal consultation on the draft Whitehouse Street Regeneration Framework ran from 17 November 2022 until 8 January 2023. The consultation survey received 143 responses which were then analysed, the outcomes of which are presented in The Whitehouse Street Regeneration Framework Formal Consultation Report. This report identifies key outcomes and response themes from the formal consultation and provides a response to each. In doing so, further signposting, context and detail is given.

## **Response to the support shown for the framework's objectives and strategies, and concept masterplan**

The formal consultation demonstrated broad support for the objectives and strategies within Whitehouse Street Regeneration Framework as well as support for the concept masterplan proposed. As a result, no amendments have been made to those key components. The particularly strong support for the Climate Change and Sustainability Objectives has been noted.

## **Response to areas of note drawn from free text analysis**

### **Segregated streets**

There were numerous formal consultation comments requesting segregation of walking, cycling and vehicular movements. Whilst already included in the framework (p45 street section diagram), this has been made more explicit by including reference to the need for segregation within the 'Footways' section (p45) and enlarging the street section diagram.

### **Community space**

Responses from the formal consultation strongly supported the creation of community space within the new neighbourhood at Whitehouse Street. Whilst this has already been included as an objective within the framework (p66) and given prominence with a 'Community Space' section (p67), the language within the framework has been amended to explicitly state that both indoor and outdoor community space is needed.

### **Accessibility**

Numerous comments were received through the formal consultation emphasising the importance of ensuring accessibility. Summarised below are the specific areas where the framework is seeking to create an accessible neighbourhood:

- Street furniture (e.g. benches, planters etc) needs to take accessibility needs into account (p46)
- On-street parking is restricted with blue badge disabled parking bays prioritised (p45)
- Specific sub-section of accessibility has been included emphasising the importance of design for Disabled People including the positioning of street furniture, cycle segregation and the use of tactile paving. A recommendation for developers to undertake accessibility audits has also been included (p46).
- Specific sub-section on the provision of housing design standards has been included, recommending 10% of dwellings to be wheelchair accessible or easily adaptable to be

wheelchair accessible and the remainder to be designed as accessible and adaptable dwellings. This goes beyond existing policy, is in line with the recommendations of the Urban Living SPD and in line with emerging policy (p81).

### **Engagement with Philip Street and Sargent Street residents**

Concern for the impact of the regeneration on the area's most proximate neighbours, those living on Philip Street and Sargent Street, was identified through the consultation. Bristol City Council (BCC) has kept in touch with these residents throughout production of the regeneration framework and will continue to engage with them as regeneration progresses, including targeted engagement. Every effort will be made to minimise disruption for these residents and provide opportunity for them to benefit from the regeneration.

### **Support for eco-friendly/climate resilient buildings**

Significant support was shown for eco-friendly and climate resilient buildings being built through the regeneration of the Whitehouse Street area, which is noted. The framework includes a number of key objectives to promote this approach:

- Development that incorporates efficient and sustainable heating and cooling systems
- Development that includes high standards of energy efficiency within buildings
- Create a neighbourhood which has been designed to mitigate and adapt to the impact of global heating on the local climate

The Climate Change and Sustainability section within the full framework document (p40-43) provides detail on the role of Sustainability Statements. The framework states Sustainability Statements should be included as part of individual planning applications and should demonstrate how the construction process can be resource efficient and low carbon, and how proposals will reduce space heating demand, be efficient in respect of energy consumption and include on-site renewable generation. With regards to on-site renewable energy generation, the framework states that where feasible and viable, developments within the regeneration area are expected to connect to the Bristol Heat Network delivering low-carbon and sustainable heat. A critical component to this will be the construction of an energy centre which is planned as part of the regeneration.

### **Request for further details on the Energy Centre and the appropriateness of its location**

The interim energy centre will generate heat using high efficiency condensing gas boilers. The interim energy centre is a strategic tool, the sole purpose of which is to facilitate the development of a permanent low carbon energy centre within Bedminster while still supplying heat to new customers prior to the operation of the permanent energy centre. Studies of noise and emissions of the interim energy centre will be carried out by specialist consultants once the location has been confirmed. However, based on previous acoustic assessments of the same equipment, it should not

generate more noise than typical background sound levels and due to the high efficiency nature of the gas boilers the emissions will be low. BCC has taken existing residents and businesses from the Whitehouse St area to see an interim energy centre in operation with many commenting on how quiet it is.

Studies are still being undertaken to confirm the exact low carbon heat source for the permanent energy centre. The permanent energy centre will similarly require specialists to undertake detailed assessments of noise and emissions. Both energy centres will be required to go through the planning process in order to be approved and built. Full details of the noise and emissions studies accompanying these planning applications will be publicly available.

### **Advocating for an increase in the biodiversity net gain target and seeking clarity of biodiversity net-gain calculations**

Natural England provides a helpful definition of biodiversity net gain (BNG) as ‘an approach to development, land and marine management that leaves biodiversity in a measurably better state than before the development took place’<sup>1</sup>. This definition has been added to the regeneration framework.

BNG is additional to existing habitat and species protections. It is intended to reinforce the ecological mitigation hierarchy and aims to create new habitats as well as enhance existing habitats, ensuring the ecological connectivity they provide for wildlife is retained and improved.

Under the Environment Act 2021<sup>2</sup>, all planning permissions granted in England (with a few exemptions) will be required to deliver at least 10% BNG from an as yet unconfirmed date, expected to be in November 2023. Until the requirement for a 10% BNG is mandated in law, BCC will seek to ensure that there is no loss of biodiversity and development takes opportunities to connect any identified on-site habitats, species or features to nearby corridors in the wildlife network.

The framework does state that ‘due to the low ecological baseline position, larger increases above this figure should be achievable in many areas’ (p75). One of the key opportunities to improve biodiversity net gain is through planting within the streets and public realm which is within the ability of BCC to control.

The Environment Act also states that biodiversity net gain will be measured using Natural England’s biodiversity metric<sup>3</sup>, as noted in the framework (p75), and habitats will need to be secured for at least 30 years. Biodiversity net gain calculations are technically complex and therefore specific detail on how calculations are made is not included. Further details can be found on the [Natural England](#) website.

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<sup>1</sup> See [Natural England - GOV.UK \(www.gov.uk\)](#)

<sup>2</sup> See [Environment Act 2021 \(legislation.gov.uk\)](#)

<sup>3</sup> See [Biodiversity metric: calculate the biodiversity net gain of a project or development - GOV.UK \(www.gov.uk\)](#)

## **Advocating for existing and dependent car users (e.g. disabled people) to not be excluded**

All areas of the regeneration area currently available to motor vehicles will remain so bar a small stretch of pedestrianised street between Princess Street / New Queen St junction and Whitehouse Street. There is further detail on traffic flow and access below. With regards disabled car users, the framework explicitly states that provision will be made for blue badge disabled parking bays (p45).

## **Concerns regarding traffic flow, access and parking**

The proposed circulation strategy will change how vehicle movements in the area are made whilst maintaining access to vehicles. By making a number of roads within the regeneration area one-way, space can be re-allocated for uses required to support a mixed-use neighbourhood and improvements to walking and cycling infrastructure, while reducing through traffic. Well-designed one-way streets with an appropriate width do not encourage higher vehicle speeds. Similarly, by removing through traffic from the neighbourhood, overall traffic levels and speeds are likely to be reduced.

The movement strategy provides a long-term strategy for the area setting out how the developments and public realm will work together. The implementation of the strategy will take time and is likely to be phased given the current land ownership. Any new access arrangements proposed should seek to accommodate the needs of existing businesses for the interim period over the course of redevelopment. Details of proposed changes to the vehicle network and traffic circulation will be subject to further consultation ahead of any changes being made.

The Clean Air Zone (CAZ) covers the northern edge of the regeneration area. The CAZ is likely to have an influence over the pattern of travel and mode of transport used by residents, visitors and those working in the area. Recognising that a number of existing businesses serve the automotive sector, the vehicle circulation strategy has been planned to allow for users of existing businesses to leave the regeneration area without entering the CAZ via Willway Street and Philip Street.

The area around Whitehouse Street was chosen for growth and regeneration in part due to its location. It is a short walk to the city centre and Temple Meads train station. Bedminster train station is within the locality as is access to a significant number of main bus routes. Other amenities such as schools and shops are also proximate. These factors combined with planned improvements to local walking and cycling infrastructure has resulted in a focus on prioritising public and active travel modes (e.g. walking and cycling).

A detailed transport assessment was carried out and has informed proposals for Whitehouse Street. The assessment concluded that the vast majority of trips generated from the regeneration will be made using active modes and public transport and that vehicle trips predicted to be generated from the regeneration will have a negligible impact upon the local highway network.

Low levels of parking within developments are however permitted and developers are expected to conduct their own transport assessments as they progress their schemes through the planning process. The current position of the administration is not to expand the extent of the current Residents Parking Scheme unless overwhelming public support can be demonstrated.

### **Seeking improvements to key bridges and roads within the locality**

The council will seek to deliver on the aspirations as set out in the framework. However, delivering these improvements will require funding to be secured, for example through developer contributions, use of Strategic CIL or external funding. Officers will explore and pursue suitable funding opportunities to deliver on these aspirations, and further consultation will be undertaken with local stakeholders prior to any changes being made.

### **Inadequacy of existing public transport provision to support transition away from private car use**

The West of England Combined Authority (WECA) has responsibility for some supported bus routes in Bristol, and information on the work being done to improve transport in Bristol is here: [Bristol streets – Transport Corridor Improvements - Travelwest](#). In partnership with First Bus, and WECA,) BCC has already delivered significant improvements in our bus network including the delivery of a cleaner bus fleet, with investment of more than £30 million since 2015 delivering 142 buses in Bristol that meet the highest emission standards. The [Bristol Bus Deal](#) has invited all operators in Bristol to help improve their peak hour services and started with the doubling of frequency of First Bus's number 2 route.

There are issues at present with operating services to the full timetable due to a lack of drivers. BCC has been working with WECA and First Bus to address these issues so that buses are more reliable.

BCC is working to make Bristol a fully connected city through the ambitious plan of an [underground mass transit system](#). This will have a transformative effect on Bristol's transport network, connecting people to people, people to jobs and people to opportunity.

Since deregulation of the bus sector in the 1980s, the local authority holds limited powers to compel bus operators to operate in certain ways. Bus users can share their thoughts with First Bus about issues experienced with the service provided: [How was your journey? \(tellfirstbus.com\)](#).

### **Lack of support for high rise buildings**

The concern regarding the height of the buildings is noted and understandable given the area is currently relatively low-rise. However, it must be acknowledged that tackling our housing crisis is an urgent priority for our city. Average house prices are now nine times higher than average earnings – the highest of all the core cities. Bristol has over 15,000 people on the council's housing waiting list,

and around 1,000 families in temporary accommodation. The city's population is also set to grow by almost 100,000 people by 2050.

It is important to note that there will be change to the character and appearance of Whitehouse Street to accommodate its regeneration as a mixed-use neighbourhood of homes, jobs and community space. This means a transition from large low-rise industrial buildings to new mixed-use buildings. The framework sets out an approach and strategy to height which is informed by BCC's Urban Living Supplementary Planning Document (2018)<sup>4</sup>. This strategy seeks to ensure buildings are appropriate in height, scale and massing in relation to the existing context and to one another as the area transitions from low-rise industrial to a residential-led, mixed-use neighbourhood.

For the framework to successfully enable regeneration and deliver much needed new homes and employment space, it must provide a structure which allows for financially viable developments, and height can help support viability. If developments are deemed unviable, they are unlikely to be built. A Scope of Community Influence<sup>5</sup> was created at the start of this project which identified viability as an area that the community will be informed about but have little influence over, unlike other areas such as the use of community and cultural buildings.

The majority of comments relating to concern about the height of buildings stated 8 storeys and above is too high. Most of the framework area has been identified as suitable for around 4-8 storeys, with the prevailing height currently in the area being 3-4 storeys. There is one area within the framework which is screened by trees from Victoria Park and is less sensitive to views to key landmarks and has been identified as suitable for buildings over 8 storeys. Each individual scheme will need to justify the proposed height of buildings through the planning process. Local Plan policies and guidance that relate to high-quality design will be used to assess future planning applications and these are referenced within the regeneration framework (p60).

Views to and from Victoria Park are valued by the local community and the framework seeks to protect key views from Victoria Park to city landmarks (p60) which have been identified (p23). It is however important to state that the views that current residents experience from Victoria Park will change because of the need to accommodate the increase in height.

With regards to views to Victoria Park, dependent upon how plots are planned in detail, there is likely to be views between buildings that will enable residents to still experience Victoria Park, albeit this will depend upon where individuals reside and lines of sight. The importance of Victoria Park is recognised, but it does not fall into the same category as designated heritage assets or other significant landmark buildings that are experienced from Victoria Park when looking north, which the regeneration framework seeks to protect.

## **Advocating for more affordable and social housing**

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<sup>4</sup> See [Urban Living SPD: Making successful places at higher densities \(bristol.gov.uk\)](https://www.bristol.gov.uk/urban-living-spd-making-successful-places-at-higher-densities)

<sup>5</sup> See [Scope of Influence \(whitehousetreet.com\)](https://www.whitehousetreet.com/scope-of-influence)

To deliver new homes, including affordable homes, regeneration needs to be financially viable. Cross-subsidy from sales of private or market homes is needed to support delivery of affordable homes. Regeneration of brownfield sites is typically challenging in financial terms due to additional costs associated with delivery, such as new public realm, contaminated land remediation and new and improved walking and cycling infrastructure. This has been made more challenging by the current economic climate, in which costs of materials and labour have increased significantly.

Viability advice and testing was provided as the Framework developed and has indicated that it will not be possible to deliver a policy compliant 30% affordable homes in the first phase. To support viability and kick-start regeneration, the Whitehouse Street Regeneration area is proposed to be added to the Affordable Housing Practice Note 'threshold' approach, meaning viability would not be tested on schemes offering 20% affordable housing. This would be for a time-limited period, until December 2024. Beyond this date, schemes submitted will be expected to be fully policy compliant and deliver 30% affordable housing.

The council will seek to work with developers to explore how additional affordable housing can be delivered, such as working in partnership with a registered provider with access to Homes England affordable housing grant.

The 'threshold' approach will not apply to BCC-owned sites, where the council will seek to maximise delivery of affordable homes.

### **Support for the provision of a range of employment types in the area**

Support was shown for enhancing the local economy through diversifying the types of employment in the area by providing a range of commercial spaces, which is noted and reflected in one of the objectives with the Land Use and Employment Principle: 'Provide a range of new employment types and retaining space for industrial and manufacturing businesses'. The project team commissioned an employment strategy to support the delivery of this objective, and more information can be found on page 66 of the framework.

### **Retaining and supporting existing businesses, and prioritising small businesses**

Numerous comments were received advocating for existing businesses to remain and be supported, and for small businesses to be offered opportunities through the regeneration. A core component of the vision set out within the framework is 'Protecting jobs and business' (p7) whereby 'development will seek to retain existing businesses that are compatible with residential where possible' (p7). BCC has continually engaged with local businesses throughout the production of the framework and will continue to work closely with them on an individual basis in order to support them. Whilst the council does not have any funds immediately available to support businesses, within the Cabinet report seeking endorsement of the regeneration framework, there is a specific recommendation to 'authorise the Executive Director of Growth and Regeneration, in consultation

with the Section 151 Officer and Mayor, to explore, submit funding bids, accept any funding award and enter into funding agreements for business support packages’.

An employment land strategy was commissioned to inform the regeneration framework and is summarised on page 70. The employment strategy proposes a number of different types of commercial space in order to support specific identified sectors. The types of space proposed are presented on pages 70-73 of the framework and include maker-space, small industrial space, creative studios, small office space and incubator/co-working space, all of which can support small businesses. The regeneration framework proposes the inclusion of an industrial intensification scheme (p68) in order to facilitate the delivery of the types of spaces identified.

### **More open and green space**

Numerous comments were received requesting more open and green space. The core regeneration area is made up of a number of different land ownerships and leases, with many existing businesses continuing to trade from the area as regeneration begins. In addition to the nature of land ownership and existing use, the regeneration of the Whitehouse Street area will happen over multiple phases over an extended period of time. These elements in combination makes providing a single area of public open space in the core regeneration area challenging.

The context outlined above has led to the focus of public realm improvements being on improving streets and creating multiple smaller areas of open public space. Space will be reallocated from motor vehicles to provide wider footways and areas of planting on all the major streets. In addition to this, a central plaza, two new pedestrian streets, several small pocket parks and a community growing space are planned. The regeneration area is very close to Victoria Park and proposed and new and improved areas of public open space in the Mead Street and Bedminster Green regeneration areas. Improved connections to these spaces have been included in the framework.

### **Retaining existing trees**

The consultation demonstrated support for retaining existing trees, which is noted. The regeneration framework contains a specific section on trees (p74) which states ‘wherever possible, existing street trees should be retained’. It then states that where tree loss is necessary, mitigations will be required and references relevant policy that guides mitigations, most notably tree replacement. BCC maintains a tree replacement standard which sets out how trees are to be replaced if removed and more details on this can be found on the council website: [Supplementary planning documents, practice notes and other planning guidance \(bristol.gov.uk\)](#). Whilst the relevant policies relating to tree replacement have been included within the regeneration framework explicit reference to the Bristol Tree Replacement Standard has been added to further emphasise the need for mitigations resulting from any tree loss.

### **Concern about the capacity of local services (e.g. doctors, dentists, schools) to support the increase in population**

BCC has been, and will continue to, work with stakeholders to plan for the increase in population within Whitehouse St and adjoining areas, as well as at a city-wide level. There is sufficient primary school capacity in the area to accommodate the likely increase in children from the regeneration in Whitehouse St, Bedminster Green and Mead St regeneration. There is a pressure on secondary school places which will be eased with the provision of new secondary schools at Daventry Road and Silverthorne Lane. In the short-term, it is proposed that the BCC-owned Spring St site (Plots 6a and 6b) is used as a temporary secondary school until Silverthorne Lane is completed.

BCC has started and will continue discussions with the NHS Integrated Care Board (ICB) to plan for the increase in population. The ICB are responsible for developing a plan for meeting the health needs of the population and arranging provision of health services.

### **Strengthening wording in areas to provide greater certainty**

The council will seek to deliver on the aspirations as set out in the framework, including those areas where possible or potential improvements have been identified. However, delivering these improvements will require funding to be secured, for example through developer contributions, use of Strategic CIL or external funding. Officers will explore and pursue suitable funding opportunities to deliver on these aspirations, and further consultation will be undertaken with local stakeholders prior to any changes being made.