



Living Heart for Bristol

Please reply to:

17 Ferrymans Court
Queen Street
Bristol BS2 0JB
0117 929 4664
www.livingheart.org.uk
steve.melia@talktalk.net

Development Control Committee
Bristol City Council
City Hall

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Dear Sirs,

Application Reference: 16/06594/P (Callowhill Court, Bristol BS1 3HE)

The Living Heart for Bristol¹ campaign is writing to object to the above application. We object in particular to:

- The proposed car park
- The proposed four-lane access road to the car park
- The lack of consideration for cycle movement through the site
- A lack of clarity about maintenance of public rights to the public realm

Our grounds are:

- The application does not conform to the Local Plan policies regarding car parking (Section 1).
- It runs directly counter to the objectives of the Joint Local Transport Plan for the city centre (Section 2).
- The proposed access road to the new car park would cause delays and disruption to buses, including Metrobus. It would delay pedestrians and put cyclists following the shared bus lane at risk (Section 3).
- The car park would worsen air quality at a time when the Council should be anticipating a legal requirement for tougher action on air quality in city centres (Section 4).
- The Transport Assessment and Framework Travel Plan make claims that are not credible (Section 5).
- The application would appear to obstruct the Council's own plans for improving cycle movement through that area (Section 6).
- The application appears to imply a loss of rights to the public realm that would threaten social inclusion – a key objective of the current Mayor (Section 7).

We are not opposed to redeveloping that area. We welcome the removal of through traffic on The Horsefair, but not in the form proposed in this application. Section 8 sets

¹ The Living Heart for Bristol was created by the following organisations: Bristol Cycling Campaign, Bristol Green Capital, Bristol Living Streets, Friends of the Earth, the Open Spaces Society, Bristol Ramblers Group and Streets Alive. It aims to improve the central areas of Bristol and create new public space by removing through traffic, whilst retaining access for all. Several other organisations have endorsed its declaration – shown on www.livingheart.org.uk.

out our positive suggestions for a revised application. The car park and access roads should be deleted from the application; cycle routes and commitments to the public realm should be explicitly sought, and that the applicant should be encouraged to plan for more housing on the site, which should be substantially car-free.

1. The Application’s Non-Adherence to Local Plan Parking Standards

The applicant claims that their proposed parking allocation is “significantly below the Local Plan maximum parking standard”². That claim is false. The Central Area Action Plan (7.17) refers to the parking standards contained within Appendix 2 of the Site Allocations and Development Management DPD, stating that:

where appropriate in Bristol City Centre, a significantly lower level of car parking provision will be expected.

It should also be noted that the Site Allocations DPD (para. 2.23.7) explicitly states that the standards in Appendix 2 do not apply to the city centre.

Notwithstanding that clarification, in making the claim above, the applicant was presumably referring to the standards in Appendix 2 when making the above comment. The table below applies Appendix 2 standards³ to the (gross) non-residential proposals contained in this application.

	Proposed		Policy: 1 space per:		= Policy Maximum	
Retail	59,200	m ²	100	m ²	592	spaces
Leisure	14,800	m ²	100	m ²	148	spaces
Hotel	150	beds	1	bed	150	spaces
Total:					890	spaces

The proposal allocates no parking for the hotel (which would be entirely normal for a hotel in such a location) and 900 spaces for the retail/leisure uses. However, this takes no account of the existing uses on the site, which already contains many shops. Neither the Transport Assessment nor the Travel Plan make any mention of the net increase in retail space, which would be the relevant figure to consider in this central location, where there is no direct link between specific shops and specific car parking spaces.

For the **residential** elements of the development, 100 spaces for 150 units is a high ratio when compared to similar developments in the city centre. The current proposals for the Old Ambulance Station⁴ redevelopment include a maximum of 40 parking spaces for 370 flats. Clause 7.10 of the Central Area Action Plan states that:

In locations where access is only available from streets that have been pedestrianised or have been identified for pedestrianisation it may be more appropriate to proceed with carfree or mostly car-free forms of development.

² Framework Travel Plan 6.10

³ Use Types A1/A2 within a primary shopping area

⁴ Bristol City Council (2016) Former Central Ambulance Station Redevelopment, Briefing Note.

The applicants could argue that they are planning to provide vehicular access to the new flats – but they do not have to. As explained below, we believe that more car-free housing would make a better use of this valuable land than would car parking.

2. Relevant Policies on Car Parking in the City Centre

The starting point for judging this application is one where Bristol City Council and the West of England Partnership have acknowledged that:

- There is a need to reduce travel by car to Bristol city centre, and;
- There is already too much parking available in the central area, and;

In addition the City Council has a stated aim to reduce traffic movements within the Inner Access Loop (that includes Bond Street); protecting the capacity of the Inner Access Loop is a critical part of that strategy.

Section 6.6 of the JLTP3 states that:

6.6.1 The supply and management of parking is closely linked with the demand for car use and this in turn affects traffic levels, especially in peak periods and, ultimately, congestion. It is a key part of our range of demand management measures for tackling congestion and traffic growth in some areas.

6.6.2 Parking controls can be used, where appropriate, as part of an integrated strategy to contribute to:

- *Reductions in vehicle trips to central areas during the peak providing congestion, local air quality, health and carbon reduction benefits;*

Both Section 6.7 of the JLTP and Section 3.7 of the Public Realm and Movement Strategy comment on the high number of private non-residential parking spaces in the city centre as a factor encouraging too much car travel into the city centre. The Central Area Action Plan states that:

*7.15 Although the council wishes to encourage the use of more sustainable means of transport such as cycling and walking, **retaining** an element of public car parking, particularly short-stay parking, has an important role to play in supporting the city centre economy, particularly its retail offer and cultural, leisure and tourist facilities.*

*7.17 Proposals for short-stay car parking will be considered on a case by case basis having regard to the nature and requirements of the proposed development, the **position of the site in the hierarchy of vehicular routes** and the **desirability of reducing car use** in favour of more sustainable modes of transport. [emphasis added].*

The key word in clause 7.15 is ‘retaining’, which clearly implies that the policy **does not support substantial increases** in the parking capacity of the city centre, which this application would cause.

The position of this site in relation to the hierarchy of vehicular routes is clearly a major problem. The Inner Access Loop is identified as a key thoroughfare, one that is likely to become more important over time; the proposal to create an access road across it would cause serious problems, as described above. The reference to reducing car use is clear. In what way could an additional 900 non-residential parking spaces be deemed compatible with that policy objective?

The Central Area Action Plan leaves considerable discretion on how to apply parking standards within the city centre. In interpreting that policy the following factors are relevant:

- There are already four large public car parks in walking distance of the proposed development
- There are already shops on that site, served by those car parks, although most of their customers are likely to arrive by sustainable modes.
- Most of Bristol's buses stop within walking distance of the site (including Metrobus in future)
- The site is within walking distance of Temple Meads station, with the MetroWest project planned to increase access from across the sub-region
- The acknowledged surplus of parking spaces across the city centre
- The authorities objectives to reduce traffic heading towards the city centre and around the Inner Access Loop.

3. Objections to the Proposed Access Road

We refer members to **Page 2 of Annex G Off-site Highway Proposals** submitted by the applicant; this shows how the proposed access road would interrupt the bus lane carrying Metrobus and oblige vehicles to turn across the bus lane to enter or leave the car park. The proposed traffic lights would delay Metrobus and the other buses using one of the most heavily-used bus lanes in the city.

This proposal would create two interruptions to that bus lane within a short space. That bus lane is also a cycle route; the traffic turning across that lane would create hazards for cyclists. It would break the pavement twice within a short space, delaying the movement of pedestrians. Finally, a four lane road in that location would detract from the quality of the urban environment in a location where attracting visitors is of great importance.

4. Worsening Air Quality and the Recent High Court Ruling

Although the effect may be incremental, the proposal for the car park would increase traffic volumes and congestion, increasing pollution within the Air Quality Management Area. The Council's attention is drawn to the recent High Court ruling and the Government's response, which is likely to require tougher measures to tackle air pollution in city centres. At such a time, the Council should not be making commitments to developments which will make that legal obligation harder to fulfil.

5. Weaknesses in the Transport Assessment and Framework Travel Plan

Transport Assessment (13.148) states that the traffic impact of the development will be “minor and negligible” and “therefore, no mitigation measures are considered necessary”. However, the same document also lists 8 streets where traffic flows would increase by more than 10%; on five streets the increase would be more than 30%. The phrase “professional judgement” is used several times in Chapter 13 to support claims that the development will not significantly worsen current conditions. Those “judgements” are highly speculative; modelling outputs cannot be considered reliable in such a congested context. Clearly a development of this size in a central location needs a credible plan to offset its traffic impacts. The Framework Travel Plan is supposed to provide such a plan.

The Framework travel plan (7.1) states that there will be (unspecified) targets to increase the proportion of employees, residents, customers and visitors travelling by active modes or public transport. Of those four categories ‘customers’ are likely to form a large majority. However, amongst the specific measures described in Section 6, the only ones that would apply to customers are:

- 6.6 On-site signing
- 6.7 Cycle parking
- 6.12 Electric charging points within the planned car park
- 6.19 (Unspecified) ‘Travel information’

This section includes the false claim about parking standards, discussed above. Given the proposed approach to car parking, the Travel Plan does not present a credible strategy for achieving modal shift.

The baseline travel survey was conducted in Cabots Circus, not in Broadmead. Its finding of a 44% modal share of travel by car is extremely high for a city centre site; it compares with a Council survey in 2012 which found that just 27% of people interviewed in the Old City had travelled by car.⁵ The high modal share of driving to Cabots Circus is due to the large car park provided on the junction between the Inner Access Loop and the M32 – a factor that is already causing much of the congestion and pollution in that area.

6. Concerns About Cycle Movement and Freedom of the Public Realm

The application stresses the importance of cycle parking but curiously, shows access plans for vehicles, for pedestrians but not for cyclists. Indeed the Transport Assessment quotes the NPPF as saying that developments should “give priority to pedestrian and cycle *movements*” but it gives no details about how this would apply, if at all, to the site.

The details are very sketchy but the plans appear to imply that movement through the site by bicycle would become impossible. The document entitled ‘Approx Position Streets’ shows a ‘Build Zone’ effectively blocking all movement along what is currently The Horsefair. The Council’s officers working on cycling issues have been looking to improve cycle movement in that area, to replace the shared use on Broadmead, which is not working well. This application would appear to scupper those plans. **It is vital therefore, that the officers engaged in cycling plans for the city centre are consulted on this application.**

⁵ Bristol City Council City Design Group (2012) Old City Core Realm Scoping Study (Appendix 1).

7. Threats to the Public Realm and Social Inclusion

As the plans appear to suggest private building over what is now a public highway, this raises broader concerns about the privatisation of public space. The outdoor areas currently controlled by the Bristol Alliance are subject to restrictions that do not apply to the public realm in Broadmead. A ban on cycling is one of those restrictions; there are several others, that particularly effect marginal groups such as homeless people and Big Issue sellers. In the interests of **social inclusion** (a key objective of the Mayor) the council must ensure that all current rights to the realm are maintained in a revised application, which should follow the rejection of this application.

8. Our Proposed Alternative – More Housing

We are not opposed to redeveloping this site. We welcome the removal of through traffic along The Horsefair, but not at this price. To remedy our concerns (and comply with the Council's own policies) the car park and access roads should be deleted from the application; cycle routes and commitments to the public realm should be explicitly sought.

Deletion of the car park would free up more land. This could offer the opportunity to address another key objective for the Council: more housing. The Central Area Action Plan (7.10) allows for car-free housing and the precedent has been set elsewhere in central Bristol (e.g. Waverley and Balmoral Houses on Canon Street). This site, served by Metrobus, within walking distance of Temple Meads and (potentially) connected to the main cycle routes, would be ideal for car-free housing.

If the applicants state that they cannot support the volume of retail expansion without more car parking, this would suggest two alternatives:

- 1) Expand one of the existing multi-storey car parks, or:
- 2) Reduce the scale of the commercial redevelopment and increase the quantity of housing instead

We would very much prefer the latter, although the former would be preferable to the application as it currently stands.

Yours faithfully,



Steve Melia
For the Committee of
Living Heart for Bristol.