



Living Heart for Bristol

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Bristol City Council
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Dear Sirs,

Local Plan Consultation

This letter is a response from the Living Heart for Bristol campaign¹ to the consultation on the draft Local Plan. Some of our member organisations will be making more comprehensive submissions. This letter focusses on two key concerns, which cut across several sections and policies:

1. The document does not recognise that the city centre is an important and growing *residential area*. The needs of city centre residents should be specifically acknowledged, in a similar way to the residents of Avonmouth, as set out in section 3.1.14. Why does the draft plan treat those two groups of residents so differently?
2. (Related to 1) The plan aims to increase the population and employment density of the city centre, (aspirations which we broadly support) but makes no specific proposals to prevent associated traffic growth from damaging the environment of the city centre. The comments below make some specific suggestions on how this problem should be addressed.
3. With the plans to accelerate population growth in the city centre, there is a need to create more public space.

Policy BCAP26 (Old City)

This policy, scheduled for retention, includes useful references to reducing traffic, pedestrianisation and carfree development. It is insufficiently specific and only applies to the Old City. This policy should be applied to all of central Bristol and should be amended to:

- Make more specific proposals for traffic removal and pedestrianisation

¹ The Living Heart for Bristol aims to improve the central areas of Bristol and create new public space by removing through traffic, whilst retaining access for all. It was created by the following 8 organisations: Bristol Cycling Campaign, Bristol Green Capital, Bristol Living Streets, Friends of the Earth, Transition Bristol and the Open Spaces Society, Bristol Ramblers Group and Streets Alive. Ten other organisations and two MPs have endorsed its declaration – shown on www.livingheart.org.uk.

- Set out specific circumstances and locations where carfree development will be required

Policy BCAP29 (Car and Cycle Parking)

We note the intention to review this policy to ensure consistency with air quality and efficient use of land objectives. Environmental quality and sustainable transport (traffic reduction) should be added to that list.

The following phrase is too vague:

“These standards [in Appendix 2 of the Core Strategy] will also apply within the Central Area Plan area but, where appropriate in Bristol City Centre, a significantly lower level of car parking provision will be expected.”

It has allowed the inexorable increase in parking capacity within the city centre to continue (e.g. the recent approval for an additional 350 space car park to serve Broadmead). It should be replaced with:

- A statement that current levels of parking capacity within the city centre are unsustainably high, and must be reduced
- A presumption in favour of carfree residential development
- A principle of no net addition to parking capacity from any non-residential application

Section 6.2 Protecting Open Space

Section 6.2 is inadequate as applied to the city centre. Proposal ULH3 (Urban Living) would accelerate population increase in the city centre. Chapter 5 would increase the number of people employed in the city centre. The few existing areas of public space in the city centre (e.g. Castle Park, the Harbourside) are already saturated at many times of the year. These plans for intensification require a specific policy:

- Plans that would increase the population or the number of jobs in the city centre should be accompanied by plans to increase the amount of public open space in the city centre. This should primarily come from reconversion of road space.

Evidence Supporting These Recommendations

In explaining our reasons for these recommendations, we would draw the Council’s attention to the following:

- The paradox of intensification:² This article demonstrates with evidence from the UK and elsewhere that ‘urban intensification’ – what is called ‘urban living’ in this draft policy – will increase traffic, congestion and pollution unless it is “accompanied by more radical measures to constrain traffic generation within intensified areas.”

² Melia, S., Parkhurst, G. and Barton, H. (2011) [The paradox of intensification](#). Transport Policy, 18 (1). pp. 46-52.

- The policies of the Mayor of London and Inner London boroughs, which have longer experience of managing the traffic impacts of urban intensification. See in particular:
 - The new lower parking standards proposed within the draft London Plan³
 - The evidence published by TfL⁴ demonstrating a direct relationship between parking restraint and traffic generation.
- The example of Leicester (also run by a directly-elected Labour mayor) which has followed the approach outlined above. [This video](#) provides a brief overview. Leicester's Mayor or Deputy Mayor for the Environment will be able to provide more information on their approach.

Yours faithfully



Dr Steve Melia
For the Committee of the Living Heart for Bristol

³ Mayor of London (2017) Draft London Plan. [Policy T6.1 Residential parking](#)

⁴ TfL (2011) [Residential Parking Provision in New Developments](#)