



Living Heart for Bristol

Please reply to:

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Bristol City Council
City Hall
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Dear Sirs,

Urban Living SPD Consultation

This letter is a response from the Living Heart for Bristol campaign¹ to the consultation on the Urban Living SPD.

We are broadly supportive of the draft policy's aims to selectively raise urban densities, to provide more housing in the city and to improve the quality of high-density housing. In particular we support the principles of:

- Higher densities around transport hubs
- Vertical mixing of compatible uses (page 15)
- Walkable neighbourhoods (page 22)
- Better provision of cycle parking in flats (page 42)

We believe the policy's **statements on transport, movement and public space are seriously deficient**, however. Our main **recommendations** are that the policy should include clear statements that:

1. In areas targeted for 'urban living' i.e. higher population densities, total volumes of traffic will be reduced, by measures such as road closures, diversion of through traffic, filtering and/or pedestrianisation.
2. Additional public space will be created in these areas, to reflect the greater needs of a rising local population.
3. Public transport improvements will be targeted at these areas, in parallel with the increased housing density.

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.

4. Parking will be controlled within these areas with the aim of restraining and offsetting any increase in parking volumes which might otherwise result from new development.

The following sections of the report raise serious concerns and should be replaced:

- **Dominant road infrastructure**...(page 19). This section is weak and unspecific. The phrase “an opportunity to think about” implies inaction on the part of the Council.
- **Car parking accommodated**...(page 30). This section implies a ‘business as usual’ approach to parking in the densified areas. If existing parking ratios are applied to areas scheduled for densification, this will increase the number of vehicles and the trip generation in the area.

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.”
- 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.

Yours faithfully



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

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

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

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