

## **Cribbs/Patchway New Neighbourhood Development Framework SPD Informal Draft for Consultation - November 2012**

### **Response of Bristol City Council**

1. The role of the SPD in guiding and coordinating development is welcomed. However, its effectiveness is constrained by the large number of factors which remain unknown or uncertain at this stage. The City Council is concerned that unless more information is provided the SPD may be insufficiently clear to co-ordinate development and to prevent harmful impacts on neighbouring communities.
2. A number of adjacent Bristol communities – particularly Henbury, Brentry, and Southmead - will be directly impacted by the substantial development proposed at Cribbs/Patchway. Others, such as Horfield and Westbury-on-Trym, will also experience significant impacts, particularly in relation to the inevitable growth in traffic volumes. Key concerns regarding the impact on Bristol communities can be summarised as:
  - Potential impacts on severely congested routes and junctions, with no clear proposals or modelled impacts to demonstrate that workable solutions can be delivered
  - A lack of clarity regarding provision of a hierarchy of transport routes through the Cribbs/Patchway site and how they will be used
  - The need for timely delivery of public transport infrastructure – including rail – if car use is to be minimised
  - The absence of a phasing plan to establish the order in which developments and related infrastructure will proceed
  - The need to plan for the local management of traffic in adjacent communities to address problems of “rat running” and on street parking in residential streets
  - Green infrastructure impacts including the impact on access land at Charlton Common, loss of existing Green Belt and the affect on formal and informal recreation.

A further concern relates to reference to retail development. Although not reflected in the text, the framework diagram includes reference to retail led development at the Mall. This is not consistent with the Core Strategy and should be removed (see comments below on the Framework Diagram).

#### *Future work and community involvement*

3. The current round of consultation will generate the need for additions and amendments to the informal draft SPD. The City Council suggests that time should be devoted to giving careful consideration to changes to the document, even if this creates some delay in producing a formal draft. It is

particularly important that comments from local residents and community groups in north Bristol are carefully considered, as they are best placed to understand and articulate the likely impacts of the development on their areas.

4. As the scope of the informal draft SPD is limited by the lack of detail at this stage, the proposed developments at Cribbs/Patchway will no doubt be the subject of further masterplanning and other more detailed planning. Cross boundary working, involving affected communities and stakeholders, should be sustained from conceptual planning through to the detailed phases of implementation. It is suggested that a programme be added to the Development Framework which sets out a process and timetable for ongoing engagement with a range of stakeholders including local communities in north Bristol and the City Council.
5. Because of the limited detail contained in the document there is clearly a substantial body of more detailed work to be undertaken to translate the requirements for infrastructure and services into effective actions as development progresses. Bristol City Council would be pleased to offer assistance in the shaping and delivery of any cross boundary development requirements, such as transport improvements and new community facilities, where these require a collaborative approach.

### **Comments on specific sections of the informal draft SPD:**

#### ***Introduction and Background***

6. In the paragraph "October 2012 – Cribbs/Patchway Key Stakeholder Workshop" a list of key outcomes/challenges is provided. It is suggested that Issue 15: "Overall transport impact" should be added to the Key Outcomes/Challenges list of bullet points.
7. In the reference to Policy CS26, "areas 1-5 on Figure 6" should be "*areas 1-4 on Figure 6*".

#### ***Vision & Objectives***

8. The general aims of this section of the SPD - sustainable development, with an integrated, comprehensive and collaborative approach - are welcomed.
9. The list of six bullet points on the left hand side of the page headed "Visions and Objectives" would benefit from the addition of a further bullet point in recognition of the transport challenges. It is suggested that this should read: "Provision of transport options offering alternatives to the car and minimising impacts on existing communities."

10. The paragraph headed "Collaboration" appropriately sets out the need for a collaboration agreement, or similar, between landowners. This is an important step towards the successful delivery of new development but may need to be expanded to embrace a wider range of interests to ensure that other key parties are fully engaged - for instance, the Highways Agency, Network Rail, etc.

### ***Access and Movement***

11. The City Council is very concerned that adjacent communities at Henbury, Brentry, Southmead and elsewhere along some of the main corridors leading from Cribbs/Patchway will be affected by increased congestion and the environmental effects of increased traffic. These concerns cannot be properly addressed until the data to establish any impacts is available. At the time of preparing this response the City Council had not received traffic modelling outputs to enable the impact of movements at different locations to be quantified and the scope for mitigation assessed.
12. The Access and Movement section of the informal draft SPD provides only limited information on the functions of particular routes within the site. It remains unclear which routes will accommodate the main vehicular movements. This is a critical issue as it determines the locations which will be most affected by traffic impacts. Given the extreme pressures on the existing surrounding road network, there is a risk that additional congestion will be created if movements are not appropriately managed.
13. Identification of costs, viability, timing, location and delivery within the informal draft SPD is limited, as is evident from the Access and Movement tables, where transport infrastructure is poorly specified. Lack of modelling data to assess traffic impacts is a particular issue.
14. The informal draft SPD's broad aims of creating a more sustainable pattern of movement are supported. The Key Principles for Access and Movement are generally supported, subject to the following comments:
  - The principle of making sustainable modes of travel more convenient than car use is welcomed. The aspiration to improve north-south links at Cribbs/Patchway is supported subject to these not creating any unacceptable impacts on communities adjoining the development area.
  - The principle of prioritising walking and cycling routes, including providing connections, is welcomed. To the south of Cribbs/Patchway, the most important cycle links are those along Station Road, Henbury which provide links to national and regional cycle routes. There are also strong desire lines along the A4018 which need to be improved. Charlton Road also provides an opportunity to develop pedestrian and cycle links. It will also be important to provide good links to the A38 for use by pedestrians and cyclists. Fishpool Hill also provides

opportunities for pedestrian and cycle use, subject to careful consideration of the impacts on existing communities.

- The principle of providing sustainable travel options, including public transport, from the first occupation of development is essential in ensuring the development does not harmfully impact on existing communities. This will require good accessibility to parts of the site remote from the A38 and A4018, probably involving early provision of a public transport link between Charlton Road and the San Andreas roundabout. Any link should be designed to only be used by public transport. The impacts of this proposal on communities in north Bristol should be carefully considered and subject to detailed consultation and involvement.
- The principle of creating walkable neighbourhoods, with higher density development concentrated around the most accessible parts of the development may help to encourage transport modes as alternatives to the car.
- There is existing access from Charlton Road to the industrial units on the south side of the railway, including the Brabazon hangar and the car park north of the railway. It is suggested that some limited access should be retained here, but not as a through route.
- There is uncertainty regarding the proposal to widen the access across Charlton Common. Is it intended that this would only serve existing developments or provide access to developments to the north west? The City Council would be concerned if this was to become a through route. The City Council raised an objection to the planning application for the widening scheme and remains concerned about the impact on the Common, having regard to its value to the local community and its status as access land under the Countryside and Rights of Way Act 2000.

#### *Transport infrastructure tables*

15. The tables of transport infrastructure provision provide only limited information on the schemes listed and no information on any investment which may be required within Bristol. It is expected that improvements to the A4018, the A38 and the wider road network within Bristol will be needed. Comments on individual items in the tables are set out below.

#### *Strategic Walking and Cycling Routes*

16. The Henbury Trym is satisfactory as a leisure route but does not connect to the south as there is no route for pedestrians/cyclists to cross the A4018 and railway. It is suggested that a connection to Station Road be shown, using the proposed new junction into Cribbs/Patchway to provide a route

for pedestrians/cyclists to cross the A4018. This would provide good access for routes into Bristol.

17. Fishpool Hill has the potential to act as a walking/cycling link, subject to the management of general traffic on this route. See comments above regarding community involvement.

#### *Bus network and Infrastructure*

18. The bus references do not mention the Charlton Road – San Andreas roundabout route. This has the potential to improve public transport accessibility of the site and should be given appropriate consideration – subject to the comments above regarding community involvement.

#### *Rail*

19. The aspiration for rail stations on the Henbury Line adjacent to the A38 and A4018 is supported. It is suggested that the Henbury Line be upgraded. It is also suggested that the term “line” should be used, rather than “spur” or “loop”, whilst the nature of the service to be provided remains under discussion.

#### *Highways Infrastructure (off-site improvements)*

20. The City Council would wish to see an area wide scheme of highway mitigation, including roads within Bristol. This should not be limited to the A38 and A4018, as works to a number of other roads are expected to be necessary. This should be guided by sub-regional modelling.
21. It is noted that no estimate of the value of mitigation works is offered in the relevant table. Informed by transport modelling, appropriate mitigation will be required in the form of improvements to public transport and to pedestrian and cycle networks. There will also be substantial costs associated with mitigating the impact of development on the road network in Bristol which will need to be funded by the development. It will be necessary for Bristol City Council to be a party to legal agreements associated with planning applications in the new neighbourhood to address these matters.

#### **Community Infrastructure**

22. South Gloucestershire Council is requested to continue to liaise with the City Council on particular matters relating to schools, nurseries, health facilities, built sports provision, etc. as necessary. Local communities in north Bristol should also be consulted on proposals for community infrastructure which may have an impact in those communities.

#### **Green Infrastructure**

23. Bristol City Council supports the principle of cross boundary multifunctional green infrastructure links (as set out in BCS9 of the Bristol Core Strategy). However, there are some points which would benefit from additional and more explicit detail, to ensure green infrastructure is designed and delivered to benefit existing cross boundary linkages and to avoid harm to adjoining green assets and communities within Bristol.
24. Point 6.3 and bullet point reference to sustainable urban drainage: An explicit provision should require the design and placement of development and SUDS schemes on the development site to avoid adding pollutants to the Henbury Trym river. It is also essential that flood risk assessments extend throughout watercourse catchments inside and outside the development area. Any flood risks, and mitigation requirements, outside the development area should be identified.
25. Point 6.4: In order to avoid negative impacts on ecology, recreation, safety and character of existing or new green infrastructure, the design of green links should facilitate pedestrian and cycle movement, whilst ensuring motorised access (in particular motorcycles) is avoided.
26. Point 6.6: Where new or existing ecological corridors are provided these should extend to habitats and features within adjoining sections of the Bristol Wildlife Network to ensure that the proposals integrate effectively with their surroundings - in particular, habitats and features along the green corridor referred to as the Henbury Trym recreational route (Henbury Open Space and Tormartin Crescent Allotment Wildlife Corridors); and any green infrastructure within the development site adjacent to Okebourne Road Open Space Wildlife Corridor; and Filton Golf Course SNCI.
27. In addition Bristol City Council requests that the following points are addressed:
- Ensure development or vehicle access would not harm Charlton Common. Whilst enhancement to the pedestrian and cycle environment to enhance the nature of the green link could be appropriate, a widening of access to accommodate vehicle traffic could damage the character, use and intrinsic value of the Common.
  - The strategic diagram needs to more accurately reflect the key components of Strategic Green Infrastructure, set out in the text, particularly the key measures listed as bullet points. For example, the desire for a Henbury Trym recreational corridor and enhanced streamside vegetation to extend through the western edge of the site should be labelled or numbered on the framework diagram.
  - A more explicit statement under the 1st bullet point which would ensure sensitive and key views of the site from Filton Golf Course, extending along the ridgeline towards Brentry are protected and avoid potential

negative impact on the historic landscape of Blaise Castle Estate, including the Westbury Trym River Corridor.

**Comments on the Cribbs/Patchway Framework Diagram:**

*Retail development at Cribbs Causeway*

28. The references to “retail led mixed development” should be removed from the Framework Diagram. An SPD is intended to add further detail to the policies in the Local Plan, not to be in conflict with it (NPPF Annex 2). The notation of retail led mixed use in the northern area of the informal draft Framework Diagram conflicts with the Core Strategy Inspector’s draft main modifications deleting Policy CS14A of the post submission changes. Assuming that the Inspector’s main modifications are adopted, the concept of “retail led mixed use” within the Framework Diagram of the SPD would conflict with the Core Strategy.

*Transport Considerations*

29. The transport principles shown on the Framework Diagram are helpful. However, it would be useful to show a primary (and possibly secondary) highway network in order to guide developers and ensure co-ordination. The adopted SPD should clarify which routes will be for all traffic, which for public transport and which for pedestrians/cyclists.
30. The proposed A4018 rail station should be located slightly further to the west in order to link with land in the control of the City Council and avoid the station backing onto existing rear gardens in Bristol.
31. The public transport connection to the A4018 appears to be shown as being too close to the bridge and therefore difficult to construct.
32. It would be sensible to extend the pedestrian/cycle route beside the Trym to provide a high quality pedestrian/cycle link to Station Road (in Bristol) and facilities beyond.