



Representation Ref:
(For official use only)

Respondent Ref:
(For official use only)

Part B

This section will need to be completed for each representation made. Please photocopy or download from the council's website additional copies of Part B as required.

Organisation or Name Bristol Food Policy Council

1. To which part of the Site Allocations and Development Management Policies (SA&DMP) does this representation relate?

Development Management policy no.	DM23 and Parking Schedule	Site Allocation ref. no.		Designation name	
Paragraph no.	2.23.1 – 2.23.6 & Appendix 2	Page no.	38-40 & 75		

2. Do you consider the SA&DMP is 'sound'?*

*The considerations relating to a development plan being sound are explained in the National Planning Policy Framework (paragraph 182) Yes No

If you ticked the 'No' box, do you consider the SA&DMP is unsound because it is not:

- (1) Positively prepared Yes
- (2) Justified Yes
- (3) Effective Yes
- (4) Consistent with national policy Yes

3. Do you consider the SA&DMP complies with the legal / procedural requirements for preparing a development plan?

Yes No

4. Please give details why you consider the SA&DMP is unsound or not legally compliant. Please be precise as possible. If you wish to support the soundness or legal compliance of the SA&DMP please also use the space below to set out your comments.

Both the Core Strategy (BCS7) and the National Planning Policy Framework (Chapter 2 'Ensuring the vitality of town centres') promote development in local centres. Core Strategy BCS10 supports the transport user priorities.

However the proposed parking schedule allows for greater levels of car parking for large (1,000 sq m and more) out of centre retail developments than for smaller in-centre developments. This will make out-of-centre retail developments more attractive and will undermine the vitality and viability of local centres and will encourages car use. This is contrary to the Core Strategy policies and thus it is unsound.

To illustrate the point the recent approved Sainsbury superstore application on the

Memorial Stadium site was for a 9,346 sq m gross superstore. At the proposed standard of one space per 14 sq metres, it could have a 668 car park spaces plus 33 disabled spaces (5%), a total of 701 spaces. This is significantly greater than the 572 spaces in the application, which demonstrated how excessively generous this car parking standard is.

There should be an upper limit in the number of car park spaces, regardless of the size of development.

There needs to be careful attention to provision of car parking. The Council's commitment to carbon reduction of 40% by 2020 requires careful scrutiny of all use categories – including retail – to ensure that efficiencies are maximised and vehicle numbers are minimised.

There should be a general presumption in favour of multi-use of car parks – eg commuter during the week day/retail at the weekend/ leisure in the evening – rather than every development meeting just its own requirements. It is far better to encourage financial contribution to off-site car parking provision (such as park and ride sites) than expect provision within each development as this is a more efficient use of land. This is increasingly important with the need to reduce carbon emissions and improving resilience to challenges such as oil price rises. We should encourage developments to contribute towards improved public transport services rather than provide car parking spaces.

There should be a planning condition that there is a parking fee for using off-street car parks (ie so you can no longer park for free at an out-of-centre superstore) to ensure equity between out-of centre developments and local centres that rely on on-street parking.

There is no explanation in the proposed schedule for the different standards for the different standards for developments within primary shopping areas or secondary shopping frontages and those that are not or for food and non-food stores or for stores over 1,000 sq m compared to those under 1,000 sq m.

(continue on a separate sheet if necessary)

5. Please set out what change(s) you consider necessary to make the SA&DMP sound or legally compliant. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Proposed revised wording with changes in red and ~~strikeout~~.

Policy DM23: Transport Development Management

2.23.1 This development management policy sets out the transport and traffic considerations that development proposals should address. This includes parking standards for residential and non-residential development. It also seeks to ensure that new development is accessible by sustainable transport methods such as walking, cycling and public transport. It therefore helps to implement Core Strategy Policy BCS10. This policy applies across the city except the city centre. Separate policies for parking and movement in the city centre are set out in the Bristol Central Area Plan.

Development should not give rise to unacceptable traffic conditions and will be expected to provide:

- i. Safe and adequate access for all sections of the community within the development and onto the highway network; and**

- ii. Adequate access to public transport including, where necessary, provision for public transport improvements; and
- iii. For appropriate transport improvements to overcome unsatisfactory transport conditions created or exacerbated by the development; and
- iv. For pedestrians and cyclists including, where appropriate, enhancing the pedestrian and cycle network and, for major non-residential schemes, providing adequate changing, shower, storage and drying facilities for cyclists.

Proposals should be supported by a Transport Assessment and/or a Travel Plan where development is likely to have a significant traffic impact.

Parking and Servicing

In accordance with the standards set out in the parking schedule at Appendix 2, development proposals will be expected to:

- i. Provide an appropriate level of safe, secure, accessible and usable parking provision having regard to the parking standards, the parking management regime and the level of accessibility by walking, cycling and public transport; and
- ii. Provide appropriate servicing and loading facilities.
- iii. Charge for off-street car parking
- iv. Promote the multi-use of car parks
- v. Provide a financial contribution to multi-use off-site car parking provision or improved public transport services as an alternative on-site car parking provision.
- vi. Provide plans for managing drop-off and pick-up as appropriate

Proposals for parking, servicing and loading should make effective and efficient use of land and be integral to the design of the development.

Parking

2.23.5 The approach to the provision of parking aims to promote sustainable transport methods, such as walking, cycling and public transport, as encouraged by Core Strategy Policy BCS10. To support local centres, in line with Core Strategy Policy BCS7, parking for out-of-centre retail developments will be restricted. In addition, by emphasising that parking, servicing and loading should seek to make effective and efficient use of land and achieve high quality design, the policy helps to implement Core Strategy Policies BCS20 and BCS21. Separate policies for parking and movement in the city centre are set out in the Bristol Central Area Plan.

Appendix 2: Parking Standards Schedule

The parking standards set out minimum provision for cycle parking and parking for disabled people. Car parking standards are maximum provision. Standards for other forms of parking and servicing are the levels considered appropriate for the relevant form of development.

Parking standards in the schedules are expressed as x spaces per x m² of gross floor space, unless otherwise stated.

The approach to parking in central Bristol will be set out in the Bristol Central Area Action Plan which will be subject to separate consultation.

For all uses:

1. Planning conditions will be used to ensure that parking fees (at a level agreed with the local planning authority) are charged on all off-street car parks of six or more spaces.
2. Developments are encouraged to contribute towards public transport improvements and/or to off-site car parking provision (such as park and ride sites) rather than provide on-site car parking spaces within each development.
3. There is a general presumption in favour of multi-use of car parks (eg commuter during the week day/retail at the weekend/ leisure in the evening) rather than every development meeting just its own requirements.

A1 (Shops), A2 (Financial and professional services), A3 (Restaurants and Cafes), A4 (Drinking Establishments), A5 (Hot food takeaway)

Vehicle Type	Standard	
Cycles	Staff From a threshold of 250 m ² , one space per 250 m ²	Customer From a threshold of 250 m ² , one space per 250 m ²
Disabled people	Staff From a threshold of 500 m ² , 5% of the parking standard to be provided in addition – minimum of one space	Customer 5% of capacity to be reserved for disabled people (minimum of one space) where form of development permits
Service Vehicles	All developments will be expected to demonstrate how servicing will be undertaken. Some reduction in the standard may be allowed where justified and in some cases on-street may be appropriate. A1 Food: From a threshold of 250 m ² , a full size loading bay All developments: From a threshold of 1000 m ² , one 3.5m x 26.5m bay and associated off-street manoeuvring space.	
Car parking	A1/A2 below 250 m ² : no standard. A1/A2 within a primary shopping area or a secondary retail frontage: From a threshold of 250 m ² – one space per 100 m ² . A1/A2 not within a primary shopping area or a secondary retail frontage: Between 250 m ² and 1000 m ² – one space per 100 m ² A1 non-food over 1000 m ² – one space per 20 100 m ² A1 food over 1000 m ² – one space per 14 100 m ² A3/A4/A5: one space per 20 m ² of drinking/dining space There is a maximum limit of 200 car park spaces (including disabled parking spaces) for all A1/A2/A3/A4/A5 developments regardless of size	
	A5 (takeaways) will be required to have plans to manage pick-up and collection of meals by customers and any delivery service.	

(continue on a separate sheet if necessary)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support the representation and suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. After this stage, further submissions will be only at the request of the Inspector, based on matters and issues they identify for examination.

6. If your representation is seeking a change do you consider it necessary to participate at the examination hearings?

No, I do not wish to participate in the examination hearings

Yes, I wish to participate in the examination hearings

7. If you wish to participate at the examination hearings please outline why you consider this to be necessary:

We would be happy to attend the examination hearings to elaborate on our representation and to hear the views of other participants on this issue if called by the Inspector.

(continue on a separate sheet if necessary)

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the examination hearings.

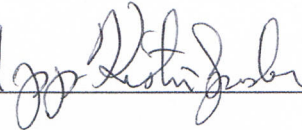
8. Do you wish to be notified at the address/email stated in Part A of any of the following:

(1) that the Site Allocations and Development Management Policies have been submitted for independent examination

(2) the publication of the recommendation of any person appointed to carry out an independent examination of the Site Allocations and Development Management Policies

(3) the adoption of the Site Allocations and Development Management Policies

Signature:

KEVIN MORGAN 

Date: 09/05/13