

Report title: Proposed extension to The Mall, Cribbs Causeway – Bristol City Council’s response

Wards affected: City wide

Strategic Director: Barra Mac Ruairi / Strategic Director Place

Report Author: Colin Chapman / Local Plan Team Manager

RECOMMENDATION for the Mayor’s approval:

That the representation at Appendix 1 is submitted to South Gloucestershire Council by Bristol City Council in respect of the planning application for an extension to The Mall at Cribbs Causeway (ref: PT14/4894/O).

Key background / detail:

a. Purpose of report:

To advise the Cabinet of the planning application for a major extension to the Mall shopping centre in South Gloucestershire and to agree the response of Bristol City Council.

b. Key details:

1. For the reasons set out in the proposed representation, officers consider that the proposed extension to the out-of-centre Mall would be harmful to Bristol because of the impact on Bristol city centre and the transport implications.
2. The proposal is considered to be at odds with national and local planning policies which establish a ‘town centre first’ approach to the location of retail development and other town centre uses. No need for a development of this type and scale at an out of centre location has been established in any local plan. The proposal is considered likely to be harmful to the vitality and vitality of Bristol city centre and to have a harmful impact on existing, committed and planned private and public sector investment in the city centre.
3. The transport implications of the proposal have not been properly assessed in the information submitted with the planning application. There is potential for significant adverse impacts on Bristol’s roads.
4. Concerns about the impact of the proposals are also being expressed by other local authorities concerning the potential impacts on the centres of Bath, Weston-Super-Mare, Swindon, Taunton, Newport and settlements in the Forest of Dean.

**BRISTOL CITY COUNCIL
CABINET
3 March 2015**

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Ward(s) affected by this report: City wide

Strategic Director: Barra Mac Ruairi / Strategic Director Place

Report author: Colin Chapman / Local Plan Team Manager

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Purpose of the report:

To advise the Cabinet of the planning application for a major extension to the Mall shopping centre in South Gloucestershire and to agree the response of Bristol City Council.

RECOMMENDATION for the Mayor's approval:

1. That the representation at Appendix 1 is submitted to South Gloucestershire Council by Bristol City Council in respect of the planning application for an extension to The Mall at Cribbs Causeway (ref: PT14/4894/O).

The proposal:

1. An outline planning application has been submitted to South Gloucestershire for an extension to The Mall at Cribbs Causeway (ref: PT14/4894/O). South Gloucestershire Council has consulted Bristol City Council on the proposals. This report proposes that an objection should be made.

2. The description of the development is:

“Alteration and extension of The Mall including the erection of new buildings for uses within Use Classes A1-A5 (shops, financial & professional services, restaurants & cafes, drinking establishments and hot food takeaway), D1 (nonresidential institutions) and D2 (assembly & leisure), C1 (hotel), C3 (dwellings comprising apartments), provision of a new multi-storey car park and alterations to existing entrances. Erection of a new bus station including uses within Use Classes A1-A5. Provision of new public realm, including public space and landscaped areas. Provision of new roads and pedestrian routes and cycle ways, including a new pedestrian and cycle bridge over Merlin Road, and other ancillary works and operations. Temporary works including provision of temporary bus station comprising works to existing surface car parking areas and temporary contractor and car parking compounds and associated facilities”.

Details of the application can be inspected via the South Gloucestershire Council web site at <http://developments.southglos.gov.uk/online-applications/> - reference PT14/4894/O.

Documents accompanying the planning application include a planning and retail statement and an environmental statement which includes a transport assessment.

The Assistant Mayor (Place) and senior Bristol City Council officers received a pre-application briefing on the proposals from the applicants on 24th October 2014.

3. The proposed extension would be located at the existing Mall, situated on Merlin Road which leads directly to Junction 17 of the M5 motorway approximately half a mile away. The Mall is on the edge of the urban area about 6 miles from Bristol city centre.

4. In summary, the proposals would comprise:

- 30,230 - 35,250m² shops, including a new anchor department store
- 6,600 - 8,980 m² services/restaurants and cafes
- 120 room hotel
- 4,000 – 7,620 m² leisure
- 21,000 – 24,270 m² other floorspace (service corridors, circulation space, plant rooms, stairwells, ancillary accommodation such as WCs)
- Multi-story car park – 1,500 replacement spaces
- New bus station
- 620 m² community facilities

Background

5. Proposals for the development of an out-of-centre shopping centre at Cribbs Causeway first came under consideration in the 1980s and The Mall opened in 1998. The John Lewis store relocated from its previous location on Horsefair in Bristol city centre when the Mall opened. Since the Mall was opened a significant proportion of retail expenditure within Bristol city centre's catchment area has been diverted to that out-of-centre location.

Planning policy

6. The National Planning Policy Framework (NPPF) sets out a 'town centre first' approach to planning for main town centre uses such as shops, restaurants, hotels and leisure. It requires local plans to recognise town centres as the heart of their communities and pursue policies to support their viability and vitality, as well as defining a network and hierarchy of centres. The NPPF confirms that existing out-of-centre developments, comprising or including main town centre uses, do not constitute town centres.

7. The NPPF also sets out sequential and impact tests to be met for out-of-centre development that does not accord with a local plan. If proposals do not meet the tests, then permission should be refused.

8. The South Gloucestershire Core Strategy sets out a hierarchy of centres in that district. The Core Strategy confirms the out-of-centre status of The Mall at Cribbs Causeway and it is therefore not a centre in the hierarchy. Policy CS14 of the South Gloucestershire Core Strategy directs retail development to centres in the hierarchy. It makes no provision for major expansion of the Mall.

9. The Bristol Local Plan Core Strategy sets out a retail hierarchy with Bristol city centre at its head. The Core Strategy says that Bristol's role as a regional focus will be promoted and strengthened. The Bristol Central Area Plan, which has recently been confirmed as sound

by a planning inspector, sets out proposals and policies for retail development in the city centre, with a particular focus on the continued growth and regeneration of Bristol Shopping Quarter (Broadmead, Cabot Circus and The Galleries).

Implications for Bristol

10. The application proposals would result in a huge scale development of main town centre uses - over 50,000m² - at an acknowledged out-of-centre location. The Mall would be increased in size by about 50% greatly increasing the number of shops and services located there, including the provision of a third anchor department store. It would result in the creation of an out-of-centre shopping facility tantamount to a large town's scale and range within the catchment of Bristol city centre.

11. **Appendix 1** of this report sets out a proposed representation for this Council to make on the planning application. For the reasons set out in the proposed representation, officers consider that the proposed extension to the Mall would be harmful to Bristol because of the impact on Bristol city centre and the transport implications of the proposal. The key points are:

- The proposal is at odds with national and local planning policies which establish a 'town centre first' approach to the location of retail development and other town centre uses. No need for a development of this type and scale at an out of centre location has been established in any local plan.
- The proposals are not consistent with the sequential test in national planning policy – they fail to adopt the 'town centre first' approach. Uses of the type proposed could readily be located in Bristol city centre or in other centres within the large catchment area of the Mall.
- The Council's retail consultant has set out the reasons why the applicants' assessment of retail impact is wholly inadequate such that the tests in national policy have not been properly addressed (see Annex 1 of the proposed representation). The proposals would divert expenditure from Bristol city centre. This would be likely to adversely affect its vitality and viability. As the Bristol City Centre Retail Study 2013 has indicated, it is also expected that such a large scale out-of-centre development would impact on the potential for plan-led development in Bristol city centre. Investor confidence would be harmed and development proposals would be put at risk.
- The proposals are considered to be inconsistent with the National Planning Policy Framework's approach to promoting sustainable transport. The transport implications of the proposal have not been properly assessed in the information submitted with the planning application. There is potential for significant adverse impacts on Bristol's roads. It is also noted that the Highways Agency has raised concerns about the potential for impact on the motorway network. Detailed consideration of transport issues is included within Annex 2 of the proposed representation.

Implications for other areas

12. Objections to the proposals have been submitted by local authorities who raise concerns about impacts of the application proposals on the centres of Bath, Weston-Super-Mare, Taunton, Newport, Swindon and centres in Forest of Dean district. Commercial interests have also made objections regarding the impact of the proposals on city and town centres.

These are available to view on the South Gloucestershire Council web site (see paragraph 2 above).

Consultation and scrutiny input:

- a. **Internal consultation:**
Transport Development Management – see Annex 2 of proposed representation
- b. **External consultation:**
N/A

Other options considered:

As the planning applications proposals are considered harmful to the interests of Bristol, no other options to the recommendation in this report have been considered.

Risk management / assessment:

FIGURE 1							
The risks associated with the implementation of the (subject) decision :							
No.	RISK Threat to achievement of the key objectives of the report	INHERENT RISK		RISK CONTROL MEASURES Mitigation (ie controls) and Evaluation (ie effectiveness of mitigation).	CURRENT RISK		RISK OWNER
		(Before controls) Impact	Probability		(After controls) Impact	Probability	
1	None	N/A	N/A	n/a	N/A	N/A	

FIGURE 2							
The risks associated with <u>not</u> implementing the (subject) decision:							
No.	RISK Threat to achievement of the key objectives of the report	INHERENT RISK		RISK CONTROL MEASURES Mitigation (ie controls) and Evaluation (ie effectiveness of mitigation).	CURRENT RISK		RISK OWNER
		(Before controls) Impact	Probability		(After controls) Impact	Probability	
1	If the City Council does not makes its views known South Gloucestershire Council will not be able to take them into account in determining the planning application	High	High		High	High	

Public sector equality duties:

The recommendation of this report is that the Council submits representations on a planning application in a neighbouring authority’s area. The decision on the application lies with that authority. Therefore, no equality impact assessment is required regarding this Council’s decision to make a representation.

The recommendation is not considered to have implications regarding the need to eliminate discrimination, harassment, victimisation or any other conduct prohibited under the Equality Act 2010 and does not have implications regarding the advancement of equality of opportunity, fostering good relations, tackling prejudice and promoting understanding.

Eco impact assessment

The recommendation of this report is that the Council submits comments on a planning application in a neighbouring authority. The decision on the application lies with that authority. Therefore, no eco impact assessment is required regarding this Council's decision.

Resource and legal implications:

The recommendation of the report is that the Council submits representations on the planning application in the neighbouring local planning authority. Bristol City Council is not the decision maker on the proposals. The submission of representations is not an action which has financial, legal or human resource implications, as listed below.

Finance

a. Financial (revenue) implications:

Submitting comments on the planning application does not have any revenue implications.

b. Financial (capital) implications:

Submitting comments on the planning application does not have any capital implications.

Comments from the Corporate Capital Programme Board:

N/A

c. Legal implications:

There are no legal implications arising from the submission of comments on the planning application.

d. Land / property implications:

There are no land/property implications arising from the submission of comments on the planning application.

e. Human resources implications:

There are no human resource implications arising from the submission of comments on the planning application.

Appendices:

Appendix 1 – Planning application reference PT14/4894/O Proposed extension to The Mall, Cribbs Causeway: Proposed representation of Bristol City Council

Access to information (background papers):

None.

Appendix 1

Planning application reference PT14/4894/O - Proposed extension to The Mall, Cribbs Causeway

Proposed Representation of Bristol City Council

1. Bristol City Council strongly objects to the application. South Gloucestershire Council is requested to refuse to grant planning permission for the reasons explained below:

National Planning Policy Framework

2. National planning policy aims at ensuring the vitality of town centres (NPPF paragraphs 23 – 27). The NPPF is clear that existing out-of-centre development comprising or including main town centre uses do not constitute town centres (NPPF Annex 2 – ‘Town Centre’). The application proposals would result in a huge scale development of main town centre uses at an out-of-centre location. This would clearly be at odds with the Government’s ‘town centre first’ policy, the importance of which has recently been reemphasised by ministers (DCLG Planning Update Newsletter January 2015). As discussed below, the proposals fail the sequential test set out in the NPPF and would have a significantly harmful impact on existing centres.
3. The National Planning Policy Framework stresses a set of key principles which should underpin both plan-making and decision taking (NPPF paragraph 17). One of those key principles is that planning should be ‘*genuinely plan-led*’. The NPPF’s section on ensuring the vitality of town centres says that planning policies should be positive, promote competitive town centres environments and set out policies for the management and growth of centres. The recent and up to date local plans for both South Gloucestershire and Bristol set out this positive, centres-based approach.
4. The application proposals are entirely inconsistent with these plan-led approaches and conflict with this key national principle. No identified needs for retail development of this scale in this out-of-centre location have been established in the recently adopted South Gloucestershire Core Strategy or any other local plan. The application proposals fail to be plan-led and would act to undermine plan-led approaches to town centres.

Local Plan policy

5. The South Gloucestershire Core Strategy Policy CS14 sets out a hierarchy of centres and directs retail development to those centres. The Mall is not included in the hierarchy and is identified as being out-of-centre. The application proposals are contrary to the provisions of policy CS14.

Planning policy history

6. The applicants have suggested in their planning and retail statement that key decisions regarding the Mall have been ‘*kicked into the long grass*’ in successive policy documents. South Gloucestershire Council is requested to disregard the comments as they are incorrect. The correct position is that national policy takes a town centre first approach and

at each stage, following independent examination, strategic expansion of the Mall at Cribbs Causeway has not been supported:

- The National Planning Policy Framework (March 2012) is clear that out-of-centre developments are not town centres. It requires a policy context to be established for ensuring the vitality of town centres, with town centres recognised as the hearts of their communities. National policy does not indicate that policies should be directed towards the expansion of out-of-centre facilities;
- Since the former Regional Planning Guidance in 2001, strategic and local planning policies have determined and reconfirmed that strategic expansion of the Mall at Cribbs Causeway should not take place. The approach to the Mall was considered during the preparation of the former draft Regional Strategy which was intended to become part of the development plan. That document stated;

'The strategic extension of the existing major shopping centres of Cribbs Causeway and Clarks Village will not be supported' (Draft revised RSS for the South West July 2008);

- Strategic expansion of the Mall was proposed again during the preparation of the South Gloucestershire Core Strategy and was rejected by the planning inspector who indicated that the scheme would be *'at odds with the NPPF'*. The South Gloucestershire Core Strategy as adopted rightly directs retail development to town centres and confirms the out-of-centre status of The Mall.
7. There is no policy delay or vacuum regarding the Mall. The approach to be taken has been considered and confirmed in all relevant documents. The future process for development plan preparation is indicated in the West of England Duty to Cooperate Schedule and provides the appropriate context for any plan-led approaches to the Mall.
 8. Under the existing, plan-led approach it is clear that retail development should be directed to the city, town and district centres serving the communities in South Gloucestershire, Bristol, Bath and North East Somerset, North Somerset and adjoining local authorities. This is the development plan context in which to consider the current application. To permit such a huge expansion of retail and other main town centre uses at an out-of-centre location would turn national and local policy on its head.

Sequential test

9. National and local planning policy requires that a sequential test is applied to proposals for main town centre uses that are not in an existing centre. The test requires applications to be located in town centres and only if suitable sites are not available should out-of-centre sites be considered. Applicants are expected to demonstrate flexibility on issues such as format and scale (NPPF paragraph 24).
10. The application proposals fail the sequential test. The applicants have not demonstrated the necessary flexibility in terms of scale or format. The proposals vastly exceed any need for main town centre uses identified in local plans. There is no requirement for development of main town centre uses of this scale in a single location. It is, therefore,

inflexible to seek to apply the sequential test to uses at the scale proposed in the planning application.

11. In terms of format, there is no requirement for the shops and services proposed to all be located in a single building at a single out-of-centre location. The shops and services proposed would be expected to be seen in retail premises on any main high street. They could readily be located within the city, town and district centres throughout the extensive area from which the Mall draws its primarily car-borne shoppers. For example, Bristol city centre contains existing retail and service premises awaiting occupiers and there are substantial areas allocated for retail development.
12. Sequentially appropriate locations should be considered in Bristol city centre, the centres of Bath, Weston-Super-Mare, Newport, Chepstow, Gloucester, Cheltenham, Swindon, Taunton and Bridgwater as well as within centres in the identified retail hierarchy in South Gloucestershire. This has not been properly and flexibly undertaken with the result that the sequential test has not been passed. The National Planning Policy Framework makes quite clear that proposals for out-of-centre retailing which fail to satisfy the sequential test should be refused (NPPF paragraph 27).

Impact on centres

13. Bristol City Council has reviewed the retail impact assessment submitted with the planning application. It is considered inadequate and is a wholly unreliable assessment which underestimates the impacts of the proposal on other centres. The assessment cannot provide a robust basis on which to consider the impacts on Bristol city centre. The deficiencies in the study are identified in the independent report appended to this representation (Annex 1).
14. It is clear from available evidence that the application proposals would have a significantly harmful impact on Bristol city centre. The proposals would divert trade from Bristol city centre which would be harmful to its vitality and viability; the impact on pedestrian flows would risk retailers withdrawing from the city centre. The application proposals would also significantly impact on investor confidence and act as a deterrent to investment in the city centre. Evidence suggests that proposals facilitated by the city's local plan would not proceed in the event of such a huge expansion of out-of-centre retailing being permitted.
15. These adverse impacts on Bristol city centre are an extremely important consideration and are of strategic significance. Bristol city centre is a multi-role centre serving the entire built up area of Bristol and a wide area beyond. It serves the residents of South Gloucestershire as well as Bristol. Indeed, a large proportion of the population of South Gloucestershire is located closer to Bristol city centre than to the Mall at Cribbs Causeway and public transport services focus on the city centre. Bristol city centre's role and status is clear in the adopted development plan and it can be regarded as an important heart for the community of the Bristol area.
16. Bristol Shopping Quarter, the primary retail district of the city centre, has been subject of significant public and private sector investment in recent years. The Cabot Circus development opened in 2008 following a £500 million investment. It provided a step change in the range and quality of retail and entertainment provision in the city centre.

The Galleries shopping centre has recently been the subject of over £5 million of modernisation and improvement. The Broadmead Business Improvement District has delivered significant improvements to the public realm. The new bus and coach station at Marlborough Street has enhanced public transport access and the proposed MetroBus will further enhance accessibility.

17. Despite these recent improvements there remain weakness and vulnerabilities which impact on Bristol Shopping Quarter's health, vitality and viability. The city centre has fallen in relative retail rankings recently, despite the positive influence of Cabot Circus. The remaining post war building stock requires on-going regeneration. There are still significant levels of vacancy and there is relatively limited provision of food, drink and leisure uses in Bristol Shopping Quarter. Further investment and improvements are required to address these issues and ensure Bristol Shopping Quarter continues to provide a strong retail environment which serves the needs of the city's residents and those of South Gloucestershire and surrounding areas.
18. The Bristol Central Area Plan¹ addresses how investment and improvement will be achieved by setting out a plan-led retail strategy for the city centre and by allocating specific sites for new development. It also provides a policy context to encourage greater diversity of uses, such as food, drink and leisure in Bristol Shopping Quarter to support its primary retail function.
19. The application proposals would bring the scale of the retail and service provision at the Mall closer to that provided in the city centre. It is, therefore, inevitable that expenditure would be substantially diverted from Bristol city centre as the evidence indicates. This will act to undermine the plan-led approaches referred to above. It will significantly impact on city centre vitality putting at risk the investment which has already been made. As evidence suggests, this is also likely to discourage the necessary planned investment required to maintain and enhance the city centre's role. This would be detrimental to the continued regeneration of Bristol city centre and contrary to the stated objectives of the Bristol Core Strategy, the Bristol Central Area Plan and national planning policy.
20. The National Planning Policy Framework is clear that proposals which are likely to have a significant adverse impact should be refused (NPPF paragraph 27).

Economic issues

21. The applicants have suggested that the proposals have a role in social and physical regeneration and would support the continuing health of the Mall. They suggest that the Mall would experience relative decline in the longer term in a no development scenario.
22. There is no evidence to suggest that the Mall would fail to prosper in the absence of the huge extension proposed. In any case, Government policy does not aim to secure the position of out-of-centre retailing. Its focus is on ensuring the vitality of town centres. The Mall is not a town centre and the application proposals would be harmful to the regeneration and prosperity of those city and town centres which are recognised through national and local planning policy as being the hearts of their communities.

¹ Following receipt of the Inspector's report, the Bristol Central Area Plan is due to be adopted as part of the development plan on 17 March 2015.

23. The applicants also suggest that the proposed development would be an economic benefit to the region. Having regard to national and local planning policy, South Gloucestershire Council is requested to place greater weight in its decision on the harm that would arise to planned investment and development in established town centres. The applicants' assessment has focussed on the immediate employment and development impacts of the extension. This approach fails to take account of the deflection of investment, the harmful impacts on existing centres and the inconsistency with national and local policy.
24. The town centres providing higher order shopping functions and serving as the hearts of their communities in the West of England are Bristol city centre, Bath city centre and Weston-Super-Mare town centre, with supporting services provided by the numerous more local centres shown in the retail hierarchies of the local plans for each area. It is more beneficial for the residents and business of the region for investment to continue to be focussed on those areas as provided for in each Council's local plans.
25. South Gloucestershire Council is also requested to have regard to the comments from local authorities outside the West of England regarding the impacts on town and city centres in those areas.

New development near the Mall

26. The applicants suggest that the proposed development helps to provide for the needs of the new communities which will be developed near The Mall.
27. The CPNN developments were included in the South Gloucestershire Core Strategy without any requirement for a major expansion of comparison retailing and leisure floorspace in the vicinity. The planning policy for the New Neighbourhood includes provision for local shopping provision and facilities to serve the needs of the new communities; these are being included within planning applications currently under consideration.
28. In terms of comparison shopping, the proposed extension to the Mall would create shopping provision which would absorb expenditure far in excess of that likely to be generated by the local increase in population (see paragraphs 10 to 12 of the report in Appendix 1). It should also be noted that the new communities lie well within the catchment of Bristol city centre and will be well connected to the city centre by public transport services.
29. The City Council has no objection to the proposals in the application to create better cycle and pedestrian routes to surrounding areas. These are welcome. However, there is no justification for a strategic scale extension to the Mall in order to meet comparison shopping needs of the new communities whose residents will account for a small fraction of the population within the Mall's acknowledged extensive catchment.

Transport impacts

30. The National Planning Policy Framework says in its section on 'Promoting sustainable transport' that encouragement should be given to solutions which support reductions in greenhouse gas emissions and reduce congestion (NPPF paragraph 30). It also identifies as

a core principle the need for planning to actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are or can be made sustainable (NPPF paragraph 17).

31. The application proposals are entirely at odds with these important aspects of Government planning policy. They would result in the unplanned provision of a very large scale development of main town centre uses served by 7,000 free car parking spaces at the fringe of the urban area, less than a mile from junction 17 of the M5. The proposed extension would inevitably generate a substantial increase in car based trips to and from the site, as the information submitted with the application clearly shows.
32. The evidence submitted with the application indicates that around 90% of the users of the Mall travel to the facility by car. It has not been demonstrated that the proposals would significantly change this proportion. The proposed links to residential areas, though welcome, are of very limited significance in terms of securing a significant change in modal share as residents in the locality will only represent a small fraction of Mall users. The improvements to the bus station, though welcome, have not been demonstrated to result in a material improvement in sustainable transport usage. It is not clear whether significant modal shift is achievable having regard to the substantial catchment area from which the Mall's customers are drawn.
33. Having regard to the transport implications of the planned development in Cribbs Patchway New Neighbourhood, the City Council is very concerned about the additional impacts on Bristol's highway network arising from the application proposals which are not provided for in the local plan. The transport assessment accompanying the application does not adequately assess the impacts the proposed development would have in terms of congestion, in particular the effects on the A4018 and the B4056. It is a significant concern that the transport assessment does not consider transport demand at key peak periods of seasonal usage or on Saturdays. The report appended to this representation explains these concerns in detail (Annex 2).
34. The City Council also notes with concern the comments of the Highways Agency regarding the impact on the motorway network, set out in the comments accompanying the Agency's holding direction. The City Council is very concerned about any proposals which would impact adversely on the operation of the junction/motorway and the consequent impacts on the local highway network. The junction is there to provide access to the motorway network to wide areas of Bristol. It is considered that any adverse impacts on the junction would be harmful to the economic well-being of the city and detrimental to residents and businesses over a wide area.

Residential development

35. The planning application proposes 150 residential units. The City Council has no objection to this part of the proposals.

Concluding comments

36. The application proposals would create an unsustainable form of development which would do significant harm. The 'town centre first' approach in national and local planning

policy is directed towards ensuring the vitality of those places which form the hearts of their communities. The proposal for a huge expansion of main town centre uses in an out-of-centre location would turn national and local policy on its head. It clearly fails the sequential test.

37. The application proposals would significantly harm Bristol city centre both in terms of the impact on existing, committed and planned public and private investment and in terms of impact on its vitality and viability. It therefore fails the impact test.

38. The proposals are likely to have a harmful impact on Bristol in terms of traffic generated. The City Council is also greatly concerned about the potential impact on the motorway junction and the implications this has for the city as a whole.

39. South Gloucestershire Council is therefore requested to refuse to grant planning permission for the proposal which is contrary to the development plan, contrary to national policy, unsustainable and likely to cause significant harm to Bristol city centre. As the proposals are contrary to the development plan, in accordance with section 38(6) of the Planning and Compulsory Purchase Act, planning permission should not be granted there being no material considerations which would indicate otherwise.

ANNEX 1

REPORT ON RETAIL IMPACT

Proposed extension of The Mall at Cribbs Causeway

REPORT ON THE APPLICANTS' 'PLANNING AND RETAIL STATEMENT'

For

Bristol City Council

February 2015

Jonathan Baldock BSc (Est. Man.) MSc FRICS MRTPI

Town Centres & Retail Planning Consultant

INTRODUCTION

1. The planning application for this proposed development was supported by a 'Planning and Retail Statement' dated December 2014, prepared by Nathaniel Lichfield and Partners (NLP). I have reviewed the 'Planning and Retail Statement', focusing particularly on its treatment of the impact test and sequential tests in the Framework.
2. I have assessed whether the retail impact forecasts by NLP are soundly based and realistic, and whether they reliably demonstrate that the proposed retail development could pass the impact tests in the Framework. I have also assessed whether or not the sequential test has in principle been properly applied.
3. In undertaking my review, I have had regard to the Bristol City Centre Retail Study, DTZ, May 2013² (the Retail Study). I have also had regard to the deposit draft Bristol Central Area Plan (BCAP), which was subject to an EIP in October 2014. The BCAP includes policies aimed at the regeneration of the Bristol Shopping Quarter, principally by means of a major retail development, a site for which is identified and allocated for this purpose.
4. After this Introduction, I comment briefly on forecast retail capacity in Greater Bristol in relation to the proposed extension of The Mall. I then review NLP's retail impact forecasts, and identify a number of serious flaws which together mean that the impact assessment in the 'Planning and Retail Statement' is wholly unreliable. I next comment briefly and in outline on the impacts of the proposed food and beverage uses, and leisure uses. This is followed by my opinion on how the sequential test has been applied by NLP.

RETAIL CAPACITY TO SUPPORT THE PROPOSED DEVELOPMENT

5. In the 'Planning and Retail Statement', NLP refer to retail capacity forecasts for South Gloucestershire commissioned by SGDC, and claim that these support the scale of new retail floorspace now proposed at The Mall.
6. The most recent forecasts of future retail capacity in South Gloucestershire are those by Roger Tym & Partners (RTP) set out in their 'South Gloucestershire Town Centres and Retail Study Update 2011', commissioned by SGDC as part of the evidence base for the development plan. This study updates the retail capacity forecasts in RTP's 'Town Centres and Retail Study', April 2010, also commissioned by SGDC. However the 2011 update is based on the same household interview survey of shopping patterns undertaken by RTP in 2009. As in most such retail capacity forecasting, the results of that survey are critical to the resulting forecasts. If the survey is unsound or its results are incorrectly interpreted and applied, the retail capacity forecasts based upon it will be unreliable.
7. RTP's 2009 household interview survey had a number of limitations and defects, the most important of which are as follows:

² As a retained Consultant to DTZ, I assisted that company to prepare that study. However for the avoidance of doubt, I confirm that in advising the Council on this proposed development, I have not worked and will not be working with or for DTZ. My report and subsequent advice is therefore wholly independent. However I have drawn upon the work of DTZ in that company's previous advice to the Council, so as to ensure consistency of evidence and advice.

- It covered an area only modestly larger than South Gloucestershire, so did not measure the full catchment area of the many retail facilities at Cribbs Causeway.
- The detailed sampling specification and survey results are not included in the report, so it is not possible to know whether the sample included age quotas or weighting of the results by age band, to ensure that it was representative of the age distribution of the population as a whole. However it is highly likely that (in common with most such surveys in 2009) it was merely a random sample of telephone subscribers; and in consequence the results were substantially biased towards the older age groups, particularly those aged 65+.
- The survey asked questions about only 6 sub-categories of comparison goods. This is a crude approach leading to unreliable results. Thus it lumped together furniture and floor-coverings with household textiles and soft furnishings; and domestic appliances with audio-visual equipment; whereas many surveys have shown that the components of each of these pairs have somewhat different shopping patterns. The survey also did not include a question about shopping habits for chemists', medical and beauty products, but lumped these goods in with 'specialist items such as jewellery, photographic goods, musical instruments or sports equipment'. Again, many surveys have shown that chemists' medical and beauty products have the most localised patterns of shopping of all comparison goods. As they account for a substantial proportion of comparison goods expenditure, this omission means that the shopping patterns indicated by the survey results are unreliable.

8. There are other weaknesses in RTP's updated retail capacity forecasts, including:

- It adopts national average forecast rates of growth in per capita expenditure, rather than forecasts specific to the study area.
- It makes too low a deduction for expenditure on Special Forms of Trading (14.7% from 2016 onwards, compared with 15.0% in 2016 rising to 17.0% in 2021 and to 18.0% in 2026 in the Retail Study).
- The household survey results appear to have been applied uncritically without any corrections to re-balance the forecasts. This produces some unrealistic results, for example RTP estimate that The Mall at Cribbs Causeway attracted only £132.3m (2008 prices) of comparison goods expenditure from the study area in 2011, compared with £205.6m attracted by the Cribbs Causeway Retail Park. To be fair, RTP do state that the survey results make distinguishing between these two locations difficult; but this example does cast doubt on how the survey results have been applied.

9. The foregoing is not a detailed review and critique of RTP's updated retail capacity forecasts.

However it suggests that the forecasts should be treated with some caution, as they are clearly not adequate to justify the proposed Mall extension. Indeed as RTP comment, *'this study is not intended to assess the need for growth at Cribbs Causeway'* (paragraph 3.3). NLP's reference to RTP's forecasts as supporting the proposed Mall extension, are therefore not correct. New retail capacity forecasts for Greater Bristol, including the northern part within South Gloucestershire, will be needed; if the next iteration of the South Gloucestershire development plan is to address the future of The Mall in the correct manner as part of the development plan process, rather than via the current outline planning application.

10. NLP state that the purpose of the proposed extension is *'to provide for the future needs of its existing customers and the growing surrounding communities of the Cribbs Patchway New Neighbourhood ('CPNN')'* (paragraph 2.26). However CPNN (including Charlton Hayes) is expected to comprise up to about 6,775 new dwellings. Assuming average occupancy of 2.3 persons per dwelling, and NLP's average catchment area comparison goods expenditure of £3,760 per capita in 2021, this new population would generate total comparison goods expenditure of about £58.6m in 2021. At NLP's and the Retail Study's assumed sales density for new comparison goods floorspace (£7,171 per sq m net), this would support only about 8,170 sq m net comparison goods floorspace in 2021.
11. Of course, not all of this additional expenditure could or should realistically be provided in the form of an extension to The Mall, as some of this expenditure would flow to Bristol City Centre, superstores, retail parks and smaller centres. However even if all of it was judged to provide support for extension of The Mall, it would justify a far smaller extension than the 24,278 sq m net stated by NLP as being the comparison goods content of the proposed extension. It is therefore clear that only a small proportion of the retail floorspace in the proposed extension (an absolute maximum of one third) is to serve the new population of the CPNN. The great majority is intended to strengthen The Mall's regional attractiveness, in competition with Bristol City Centre, and other sub-regional centres such as Bath, Weston-Super-Mare, Newport, Gloucester, Cheltenham and Swindon.
12. In any event, the 'strategic' comparison goods shopping needs of the new population of the CPNN would already be adequately catered for by The Mall and Cribbs Retail Park and superstores, by Bristol Centre, and by other centres and retail parks; and/or by major new retail development in the Bristol Shopping Quarter in accordance with the BCAP. More day-to-day comparison goods shopping needs could be met in a more sustainable way by providing new neighbourhood centres embedded in the new housing areas, and including some local comparison goods shopping facilities. The comparison goods shopping needs of the CPNN do not therefore justify the scale of the proposed extension to The Mall.
13. If the extension was permitted, The Mall as extended (but without taking account of the existing superstores and retail park at Cribbs Causeway) would be broadly equivalent in scale to the town centre of a typical free-standing town of similar size to Swindon, Crawley, or Ipswich. It would require a total support population at least as great as that of the built up area of Plymouth, for example. When the superstores and Cribbs Causeway Retail Park are also taken into account, the Cribbs Causeway area as a whole with The Mall extended, would be broadly equivalent to the town centre of a substantially larger town; and would require a substantially larger support population.
14. The Retail Study indicates that The Mall as existing has comparison goods floorspace estimated as 46,964 sq m net; whilst that in Bristol City Centre is estimated as 111,132 sq m net. With the proposed extension, the comparison goods floorspace at The Mall would increase to about 75,900 sq m net³. Thus it would rise from about 42% of City Centre comparison goods floorspace to about 68%. When the comparison goods floorspace in the superstores and retail park at Cribbs Causeway is also included, the total comparison goods floorspace at Cribbs Causeway as a whole would be similar to or greater than that in Bristol City Centre, if the proposed extension was permitted. Also, The Mall as proposed to be extended (even without the retail park and superstores) would have almost as much comparison goods floorspace as in Bath City Centre (about 95%).

³ Based on my estimate below that the proposed extension would comprise comparison goods floorspace of about 25,935 sq m net.

15. These broad comparisons demonstrate the very large scale of The Mall and the proposed extension, and the out-of-centre Cribbs Causeway retail facilities as a whole. They indicate that The Mall and Cribbs Causeway as a whole are already a very major competitor for Bristol City Centre, and would become an even stronger competitor if the proposed extension was permitted.

RETAIL IMPACT

16. In this section, I set out the results of my review of the retail impact forecasts in Section 5 and Appendices 1 and 2 of the 'Planning and Retail Statement'. Where I have not commented on aspects of NLP's report, it cannot necessarily be taken to mean that I agree with NLP.
17. NLP's comparison goods impact assessment⁴ is set out in Tables 1 to 13 in their Appendix 2.⁵ This follows a broadly conventional approach, of identifying the likely catchment area of the proposed development, estimating current and forecasting future sales in the existing town centres and retail parks potentially likely to suffer impacts, forecasting future sales in the proposed Mall extension, and from where these would come in terms of trade diversions from existing centres and stores, and hence forecasting retail impacts. Along the way, an interim step is introduced of forecasting the likely retail impacts from committed developments in South Gloucestershire (but not of such developments in any towns elsewhere in or outside the study area) and 'allocations' for new retail floorspace in South Gloucestershire and Bristol City Centre. The forecasts are therefore of cumulative impact of (some) committed developments and forecast 'allocations', plus the impact from the proposed Mall extension.
18. The assessment is based on the catchment area for Bristol City Centre defined in the Retail Study, plus an additional catchment zone to the north and one to the south. However it updates some of the data inputs to the Retail Study, such as population and per capita expenditure. In addition, NLP has undertaken (in September 2014) a new household interview survey of shopping patterns in this extended catchment area, as the basis for estimating the market shares of available comparison goods expenditure currently attracted by the existing town centres, etc; and hence of calculating the base year sales in each location and forecasting future sales.
19. In preparing the forecasts, NLP has assumed a 'design year' for impact testing of 2021. I would expect the proposed Mall extension, if permitted, to open by autumn 2019; so use of 2021 as the design year is compatible with the Planning Practice Guidance (PPG). NLP has also prepared impact forecasts for the 'horizon year' of 2026. This date is not supported by the PPG, and so these forecasts are irrelevant and should be disregarded.
20. The overall method used by NLP is in principle broadly sound. However, the reliability of the impacts which it forecasts is only as sound as the data inputs and assumptions on which it is based. In this case NLP's assessment has a number of flaws, the most important of which are set out below. These are described in the order in which the impact assessment progresses, rather than in any order of importance. I comment on their relative importance towards the end of this section.

⁴ NLP has assumed that the proposed Mall extension will sell only comparison goods. I consider this is realistic, as it provides a worst case assessment in relation to the volume of comparison goods sales.

⁵ NLP's assessment is in 2012 prices, whereas the retail capacity forecasts in the Retail Study are in 2011 prices. However there is only an extremely small difference between 2011 and 2012 prices for comparison goods, both I and NLP have compared monetary figures in the Retail Study directly with those in NLP's assessments without price adjustment. The differences due to the different price basis are extremely marginal.

21. **First**, the growth in per capita expenditure on comparison goods in the catchment area appears to be based on Experian's national average projections; rather than forecasts specific to the catchment area as in the Retail Study. Because the local economy is slightly more prosperous than the national average, this means that NLP may have underestimated recent and future growth in comparison goods expenditure in the catchment area. However the differences between NLP's forecast expenditure growth and that locally forecast in the Retail Study (albeit in November 2012) are not great, so the underestimation by NLP is modest.
22. **Second**, NLP has applied a deduction from expenditure to account for Special Forms of Trading, which is slightly below the deduction made in the Retail Study (15.9%, compared with 17.0%). I consider that 17.0% is more realistic, for the reasons set out in paragraphs 4.13 and 4.14 in the Retail Study. It is approximately mid-way between forecasts by Verdict Research and Pitney Bowes/Oxford Economics. NLP's lesser deduction increases available catchment area expenditure and hence reduces retail impact.
23. **Third**, inflowing visitor expenditure from outside the catchment area has been substantially double counted by NLP, at least for Bristol City Centre and The Mall. They have adopted for their 14 zone catchment area the same inflow percentage uplift for Bristol City Centre, +2.5%, assumed in the Retail Study for DTZ's smaller 12 zone catchment area. Of course much of the +2.5% inflow to the 12 zone catchment area is likely to come from the additional zones 13 and 14; so to assume the same inflow uplift for the 14 zones is to double count much of the inflow. This is confirmed by NLP's Table 5, which shows inflow to Bristol City Centre of £24.06m in 2014, compared with the inflow assumed in the Retail Study (interpolated for 2014) of £19.62m. This indicates that about +2% of NLP's assumed +2.5% inflow is double counted, and a more realistic inflow to the 14 zone catchment area would be +0.5% for Bristol City Centre. As a result, NLP has over-estimated base year and design year sales in Bristol City Centre, and hence under-estimated retail impacts.
24. In the case of The Mall, NLP have again assumed an inflow uplift of +2.5% from their 14 zone catchment area; whereas the Retail Study assumed only +1.0% for the 12 zone catchment area. The latter is more likely to be realistic than the former (which is the same as NLP assume for the city centre) because the city centre's overall market share and sales is substantially greater than that of The Mall.⁶ Thus if +2.5% inflow to the 12 zone catchment area is realistic for the city centre, a substantially lower inflow would be highly likely to The Mall. NLP's assumed inflow in 2014, £15.33m, for their 14 zone catchment area greatly exceeds the Retail Study's assumed inflow from the smaller 12 zone catchment area of £3.67m (interpolated). Again, this means that NLP have over-estimated base year and design year sales in The Mall, and hence under-estimated retail impacts.
25. The closer to the edge of the catchment area a centre is located, the greater the expenditure inflow uplift which should be allowed. Thus NLP has allowed for larger inflows for the more peripheral centres (e.g. Bath +11.1%, Chippenham +17.7%, Stroud +11.1%, Newport +43.0%). In principle this is realistic. However no evidence is presented to support these assumed inflow uplifts, some of which are substantial. It would have been desirable for NLP to have provided some independently sourced evidence of base year sales in these more peripheral centres, for example calculations based on retail floorspace and typical sales densities, or estimates taken from retail studies commissioned by the relevant local planning authorities. This has not apparently been done; but it means that NLP's sales

⁶ Bristol City Centre is currently a larger and more attractive centre than The Mall – albeit a centre which is vulnerable in parts to increased out-of-centre competition.

estimates and impact forecasts for centres outside Greater Bristol, such as Bath, Weston-super-Mare, Chippenham, Gloucester, etc, must be treated with considerable caution.

26. **Fourth**, NLP’s household interview survey of shopping patterns is based on a sample of respondents which is substantially biased towards those aged 65 and over. DTZ’s household interview survey was based on age-related quota sampling, and age-weighting of the results, to ensure that the final sample was broadly representative of the age distribution of the adult population; whereas NLP’s survey appears to have been based on random sampling and no age-weighting. Experience has shown that this latter sampling method results in older age-biased respondents. The comparison between the two samples in terms of the age of the respondents is as follows:

Age band of respondents	DTZ Survey*	NLP Survey
18 to 34	25.9%	6.3%
35 to 44	19.7%	10.2%
45 to 54	18.1%	19.9%
55 to 65	14.7%	16.1%
65+	21.7%	43.4%

* After age-weighting as described in the Retail Study.

This casts considerable doubt on the validity of NLP’s survey results, and means that DTZ’s survey results, despite being about 2 years older, are likely to be more reliable.⁷

27. **Fifth**, NLP’s survey results do not distinguish between use of The Mall and use of Cribbs Causeway Retail Park and free-standing superstores. They merely record use of ‘Cribbs Causeway, Bristol’ as an answer to the comparison goods questions. This means that NLP’s division of the survey-indicated market shares for Cribbs Causeway as a whole, between The Mall and the Retail Park and other stores, is a matter of assumption, apparently unsupported by any evidence.
28. **Sixth**, it is not clear how the results from each of the first and second preference questions for each comparison goods category have been combined to indicate average market shares for those categories. Thus NLP’s household survey shows first and second most used shopping destinations for each of 9 sub-categories of comparison goods. These have been combined in an unspecified way to provide average market shares for each goods category in the summary table on page 135. These average market shares for each goods category have been further combined, also in an unspecified way, to produce the overall market shares for all comparison goods set out in Table 4 in Appendix 2. Table 4 is therefore the product of a ‘black box’, the mechanism in which has not been revealed – only the inputs in the form of the raw survey data (which was not included in the ‘Planning and Retail Statement’ but provided on request), and the outputs in the form of the market shares for all comparison goods in Table 4. This makes it impossible to verify whether the market shares in Table 4 realistically flow from the raw survey data.
29. Analysis of the inputs and outputs to the ‘black box’ suggest that NLP may have weighted the first and second answers for each goods category 75/25 respectively (without providing any evidence to support that weighting); and then weighted the resulting average for each goods category according to the proportion of expenditure on it, to provide the overall market shares for all comparison goods. It also suggests that before doing these weightings, NLP may have rebased the survey results to remove the

⁷ The difference in sample size between the two surveys is not very material; as for Zones 1 to 12, DTZ used a sample of 1,500; whereas for the same 12 zones, NLP used a sample of 1,692.

respondents who said 'internet/mail order', 'don't do this type of shopping', 'don't know' and 'no answer', from the raw survey data. However as none of this is stated by NLP or clear from comparison between the raw survey data and Table 4, I therefore have to reserve my position on the realism of the method of calculating the market shares indicated in Table 4, pending clarification from NLP.

30. **Seventh**, the results from their household interview survey appear to have been applied uncritically by NLP in calculating base year sales (and projected design year sales) in each shopping destination. It does not appear as though any market share corrections have been applied, the need for which is described in paragraphs 4.20 to 4.26 of the Retail Study. The resulting base year sales estimates by NLP show that this is erroneous. Thus for Bristol City Centre, NLP estimates (in Table 5) sales in 2014 of £962.58m. However the city centre has a total net comparison goods sales area of about 111,132 sq m net, estimated from Experian Goad data. Thus NLP's sales estimate indicates an average comparison goods sales density of £8,662 per sq m net. This is unrealistically high. There are very few multiple comparison goods retailers which have 'benchmark' company average sales densities as high as this; and most independent retailers (of which there are many in the city centre) trade at well below that level. NLP do not appear to have checked their forecast sales against existing floorspace and 'benchmark' sales densities, with the result that their sales estimate for the city centre is substantially too high. The Retail Study indicates city centre comparison goods sales of about £804m (interpolated) in 2014, after necessary corrections to the market shares indicated by DTZ's household interview survey.
31. The same is true of NLP's sales estimate for The Mall. They estimate sales of £616.36m in 2014. However the net comparison goods sales area in The Mall is estimated from Experian Goad data as 46,964 sq m net. Thus NLP's sales estimate indicates an average sales density of £13,124 per sq m net. This is far above any realistic estimate based on multiple retailers' 'benchmark' company average sales densities, and is therefore clearly unrealistically high. The Retail Study, after applying necessary market share corrections, indicates comparison goods sales in The Mall of about £370m (interpolated) in 2014.
32. That NLP's estimated sales in The Mall as existing are far too high is shown by comparing its forecast sales density in 2021 with no new developments (£15,778 per sq m net), with the sales density assumed for the proposed extension in 2021 (£6,354 per sq m net). It is very unlikely that the proposed extension would have a sales density which is substantially less than that of the shopping centre to which it would be attached, as the purpose of the extension is to make the enlarged centre as a whole more attractive and prosperous. If the sales in the extension were so much lower, this would not be achieved. The two estimates are therefore clearly incompatible. This means that either the extension would have sales of around two and a half times the level estimated by NLP (in which case it would have far greater impacts on Bristol City Centre and other town centres than they have forecast), or – much more likely – the sales estimated for The Mall as existing are far too high.
33. I have not been able to check the sales estimates for other shopping destinations in the same way, owing to the lack of readily available floorspace data for them. However I consider it likely that NLP has similarly over-estimated sales in the larger centres. Thus for example NLP's 2014 sales estimates for some of the retail parks, particularly Cribbs Causeway Retail Park and other stores (£512.14m)⁸, also appear to be far too high; and should be checked against the retailers' 'benchmark' sales densities. The corollary is that NLP have probably under-estimated sales in the smaller centres.

⁸ Perhaps because of the fifth flaw identified, in the case of Cribbs Causeway Retail Park and stores.

34. NLP's excessive estimates of base year and projected design year sales in Bristol City Centre mean that they have substantially under-estimated the retail impacts on the city centre from The Mall extension.
35. **Eighth**, NLP has treated the retail capacity forecasts for South Gloucestershire and for Bristol City Centre in the respective retail studies for each, as 'allocations', which (together with the very few committed developments in South Gloucestershire) would be implemented before The Mall extension. This is wholly artificial and completely unrealistic.
36. The retail capacity forecasts are merely forecasts based on the assumptions stated. They are imperfect (as acknowledged in the case of Bristol City Centre in the Retail Study), and subject to periodic update and change. In the case of the city centre, they have not been incorporated in the BCAP as 'allocations' which must or will be achieved; and the policies and site allocations in the BCAP do not depend on any particular retail capacity forecast.
37. The retail capacity forecast under Scenario 1 in the Retail Study could not be developed in Bristol City Centre if a major extension of The Mall was to be permitted and implemented beforehand. This is because of the limited demand from the necessary 'anchor' and other multiple retailers. This is made clear in the Retail Study, which stated that the two developments would be direct alternatives to each other. Major retail development in the Bristol Shopping Quarter would take somewhat longer to bring to fruition than major extension of The Mall (because of the greater constraints in the city centre); so the latter would inevitably prevent the former from being implemented, by creaming off available retailer demand and retail expenditure.
38. **Ninth**, NLP has under-estimated the likely net retail sales area in the proposed Mall extension, and the likely sales density for the proposed 'anchor' store; with the result that they have under-estimated comparison goods sales in the proposed extension, and its retail impact. NLP has assumed a net to gross ratio for the 'anchor' store of 70%, whereas I consider that a minimum of 75% would be more likely for a department store (and probably higher for a variety store). For the other comparison goods shops, NLP has assumed a net to gross ratio of 75%, whereas I consider that 80% would be more realistic. Modern retailers rely increasingly on 'just in time' deliveries, and move most stock straight from delivery lorries onto the shop floor without storing it first. This means that they don't have large stockrooms on site. Neither do they have large offices or staff rooms. I therefore estimate that the net retail sales area is more likely to be about 25,935 sq m, rather than the 24,278 sq m assumed by NLP.
39. NLP has assumed a sales density for the 'anchor' store of £4,750 per sq m net. This would be too low for Primark, Selfridges and Next, albeit slightly high for Fenwicks. In the absence of a named retailer therefore, I consider that a more realistic assumption would be £5,000 per sq m net. Combining this with the increased net retail sales area indicates likely sales of about £166.9m in 2021, rather than the £154.27m assumed by NLP⁹. This would result in greater retail impacts than NLP has forecast.
40. **Tenth**, NLP's trade diversion assumptions are unrealistic. NLP assume the Bristol City Centre 'allocations' would divert trade from the existing city centre; whereas the purpose of major retail development in the Bristol Shopping Quarter is to make the city centre as a whole more attractive and prosperous. They also assume that the proposed Mall extension would divert trade from The Mall as

⁹ In their 'South Gloucestershire Town Centres and Retail Study Update 2011' (Appendix 4 Table 2), Roger Tym & Partners considered that an extension of The Mall would achieve a comparison goods sales density of £10,471 per sq m net in 2008 prices, equivalent to £10,358 per sq m net in NLP's 2012 prices. This is substantially above NLP's overall estimate of £6,354 per sq m net (and above my overall estimate of £6,435 per sq m net). Whilst RTP's estimate is too high, it supports my opinion that NLP's estimate is too low.

existing, and from Cribbs Causeway Retail Park and stores; whereas again the purpose of the extension is to make The Mall as a whole, and Cribbs Causeway in general, more attractive to shoppers and more prosperous. The reality is that the proposed Mall extension (being an extension of an out-of-centre regional shopping centre) would impact mainly on its sub-regional competitors, particularly Bristol City Centre, Bath, and other large centres within and close to its catchment area.

41. Clearly, because the 'allocations' in Bristol City Centre could not be implemented by 2021 if the Mall extension went ahead first (as DTZ advised), the impact of the latter should be assessed on its own without the prior impact. This would be likely to show a greater trade diversion from Bristol City Centre and thus more concentrated impact on it than forecast by NLP (particularly if the other flaws in the assessment described above were also corrected).
42. **Eleventh**, whilst NLP has estimated the impacts on centres outside South Gloucestershire and Bristol, that assessment did not take account of any committed developments in those areas. As a result, it is likely to have under-estimated the impacts on those centres cumulatively with any committed developments. NLP has also not assessed the vitality and viability of those centres and the significance of the forecast impacts, for example on the centres of Bath, Weston-super-Mare, Taunton, Newport, Gloucester, Cheltenham, Chippenham, Swindon, and elsewhere. Being an out-of-centre regional shopping centre, major retail expansion of The Mall would be likely to have significant impacts on some of these centres. The wide extent of The Mall's catchment area shown in the map on page 32 strongly suggests that this would be likely; as its catchment area is highly likely to overlap with those of some of these other centres.
43. Of these flaws in NLP's assessment, the most serious are the seventh, eighth and tenth. It is not possible to say how serious is the sixth flaw, pending clarification of the contents of the 'black box'. However the results described in the seventh flaw suggest that the mechanism within the 'black box' is incorrect. The fourth and fifth flaws mean that the results of NLP's household interview survey cannot be treated as fully reliable. The inherent older age bias in the sample may be one reason why the base year sales estimates for Bristol City Centre and The Mall are too high. The first, second, third and ninth flaws are significant, but are straightforward to correct. Correcting the first flaw may partly cancel out the effects of the necessary corrections to the second and third flaws. The eleventh flaw is a serious omission from NLP's assessment, which means that it has not adequately addressed the impact test in the Framework.
44. Overall, I conclude that NLP's quantitative impact assessment is incomplete and wholly unreliable. It does not realistically demonstrate that the proposed major retail extension of The Mall would pass the impact tests in the Framework. On page 32 of the 'Planning and Retail Statement', NLP present catchment area plans for The Mall and Bristol City Centre. These show the way in which their catchment areas overlap. However they also show the extent to which The Mall as already existing has eaten into Bristol City Centre's natural catchment area in north Bristol and beyond, and diverted trade away from the city centre. If The Mall had not been developed, the city centre's catchment area would have extended further to the north. A major retail extension of The Mall (which could be developed before a major new retail development in Bristol Shopping Quarter) would increase this effect, and further divert substantial trade away from the city centre. The precise degree of that adverse impact has yet to be determined reliably. However it is likely to mean that the proposed extension would fail the impact tests set out in the Framework.

45. Bristol City Centre now ranks 15th in the 2013 Venuescore national ranking of centres, down from its ranking of 12th in 2010, indicated in the Retail Study. It is now behind Glasgow, Manchester, Birmingham, Leeds, Liverpool, London West End – Oxford Street, Nottingham, Brighton, Cardiff, Edinburgh, Newcastle upon Tyne, Aberdeen, Norwich and Reading. This demonstrates the lack of improvement in the shopping offer of the city centre since 2010 compared with other centres, some of which have risen in the rankings to overtake Bristol City Centre.
46. Comparison between cities and their principal retail centres in terms of catchment populations can only be approximate, because of differences in local geography, data limitations and the presence or absence of competing shopping facilities. However ONS data from the 2011 census for ‘built-up areas’ (i.e. not limited by local authority boundaries), shows that excluding London, Bristol had the 10th largest built-up area population in the UK. Its built-up area population was less than those of Greater Manchester, West Midlands, West Yorkshire, Glasgow, Liverpool, South Hampshire, Tyneside, Nottingham and Sheffield. However it was greater than those of Brighton, Cardiff, Edinburgh, Aberdeen, Norwich and Reading; all of which have town or city centres ranked higher than Bristol City Centre by Venuescore in 2013. Thus Bristol City Centre is currently ‘punching below its weight’ in retail terms, partly because of the strong competition from The Mall and other out-of-centre retailing at Cribbs Causeway. Interestingly Sheffield City Centre is also under-performing relative to its built-up area population, because of competition from the out-of-centre Meadowhall regional shopping centre. This underlines the need for further redevelopment and regeneration in the Bristol Shopping Quarter, and for strict restraint on expansion of The Mall at Cribbs Causeway, as indicated in the Retail Study.
47. I note that NLP has simply not considered the qualitative impact of the proposed Mall extension on the prospects for major retail redevelopment in the Bristol Shopping Quarter. Instead, they have wrongly assumed that this would go ahead first, as an ‘allocated’ development in the BCAP. However the Retail Study is very clear that this could not happen.
48. The Retail Study concluded (paragraph 9.6), *‘Our research has shown that there is now and will be in the next few years only limited demand from the prime national multiple retailers which are essential ‘anchors’ to any substantial new retail development. These are department and variety stores and large space-using fashion, homewares and lifestyle stores. This means that irrespective of our expenditure-based retail capacity forecasts, new prime retail development will only be achievable on a scale which is supportable by such retailer demand. If the retailers potentially interested in moving to or expanding in Bristol are accommodated in an early extension to The Mall at Cribbs Causeway, they will not locate in Bristol City Centre later on when sites there can be offered to the market; and the opportunity to regenerate Broadmead in accordance with the sequential approach and the Council’s strategy would be lost. The Mall would gain market share and Bristol City Centre would lose it, perpetuating the currently somewhat poor conditions at Broadmead. Thus the commercial reality is that substantial extension The Mall would be an alternative to further regeneration of the Bristol Shopping Quarter as described above; and would effectively prevent it going ahead for many more years.’* It is therefore clear that if the proposed extension of the Mall is permitted, a scheme in the Bristol Shopping Quarter could not proceed at the same time. This means that the proposed development would fail the test of impact on planned investment in Bristol City Centre, set out in the Framework.

IMPACT OF NON-RETAIL USES

49. The 'Planning and Retail Statement includes a quantitative assessment of the impact of the proposed A3 to A5 uses. The assessment follows a similar approach to that of the retail impact assessment, based on the results of NLP's household interview survey. This means that it suffers from the fourth flaw identified above. It may also suffer from the fifth and seventh flaws; but as there are no independent quantitative forecasts of expenditure capacity to support additional A3 to A5 uses, the extent of this is uncertain. There may also be other flaws in the data and assumptions, which would emerge from further review.
50. It is clear that most large town centres have experienced substantial growth in A3 to A5 uses over many years. Such uses help to widen the reasons for people to visit a centre, increase their dwell time, and hence bring symbiotic benefits for the retail shops. They also have the advantage that in an age of increasing online shopping, they provide a service which cannot be purchased over the internet. Food and beverage uses have therefore become increasingly important to the vitality and viability of town centres, and will be likely to remain so as internet shopping continues to increase. Impact on the food and beverage outlets in Bristol City Centre and other centres is therefore an important consideration. As with retailing, such expenditure attracted to The Mall is expenditure lost to Bristol City Centre (in particular) and other centres in the sub-region. Such impacts are likely to be as significant as the impacts on retail uses, and should be taken into account in applying the impact tests. The proposed additional food and beverage uses at The Mall would reduce the potential to include such uses with major new retail development (or at other locations) in the Bristol Shopping Quarter, and therefore make it more difficult to achieve such a development in accordance with the BCAP. This means that the proposed food and beverage uses would be unlikely to pass the impact test in the Framework.
51. The proposed development also includes a substantial amount of Class D2 commercial leisure uses, of up to 7,620 sq m GIA. It is not clear what these might comprise. However (added to the substantial leisure attractions at the existing Cribbs Leisure Park, and to the existing and proposed A3 to A5 uses at The Mall) they would make the Cribbs Causeway area a significantly more attractive destination for leisure visits; and thus more of a multi-purpose destination competing more strongly with Bristol City Centre (and other multi-purpose centres such as Bath and Gloucester city centres). At least some of the proposed D2 leisure facilities could equally well be located in Bristol City Centre, for example as part of retail-led regeneration of the Bristol Shopping Quarter (where they would help to add value and improve development viability). NLP's statement that *'the leisure floorspace proposed will provide ancillary facilities that will serve existing customers at The Mall and Cribbs Causeway, rather than provide a new destination in their own right'* (paragraph 6.25) confirms that these uses would make The Mall more of a multi-purpose destination. However NLP's report does not address the issue of combined impact with the other uses, or impact on the potential leisure components of new town centre development in the Bristol Shopping Quarter planned in the BCAP. It cannot therefore be concluded that the leisure components of the proposed development pass the impact tests in the Framework.

THE SEQUENTIAL TEST

52. The Framework clearly states that in applying the sequential test, local planning authorities *'should require applications for main town centre uses to be located in town centres, then in edge of centre locations and only if suitable sites are not available should out of centre sites be*

considered....Applicants and local planning authorities should demonstrate flexibility on issues such as format and scale' (paragraph 24). In this case, NLP has argued that the purpose of the proposal is to enable The Mall to meet a particular need in South Gloucestershire and North Bristol, and that *'in order to meet the identified need, the proposed development must be linked to the existing retail/leisure destination at Cribbs Causeway'* (paragraph 8.19). However such an interpretation of 'need' would be fundamentally at odds with the government policy quoted that such new developments of town centre uses should be located in town centres first, as the highest priority location, if at all possible¹⁰. I consider that this issue is the key to how the sequential test should be applied in this case. It does not appear as though sufficient flexibility as to location (in particular – which is fundamental to the consideration of sequentially preferable locations) has been applied in formulating the proposal.

53. The maps on page 32 of NLP's report, and the results of DTZ's household interview survey demonstrate the substantial overlap between the catchment areas of Bristol City Centre and The Mall. They show that the city centre is already serving north Bristol and South Gloucestershire, albeit in some parts not to the same degree as is The Mall. It is therefore clear that an improved city centre could substantially meet the 'identified need' to serve the growing population of this area (in which most of the population growth will be in 'Greater Bristol' south of the M4 motorway, and therefore within or close to the city centre's core catchment area); and that expansion of The Mall is not the only way to do so. Providing major new retail and food and beverage development in the Bristol Shopping Quarter would make that area and the city centre as a whole more attractive to existing and new shoppers from North Bristol and South Gloucestershire, and expand the service which it provides to them. It is therefore not a foregone conclusion (as NLP claim) that the proposed development passes the sequential test simply because it is an expansion of an existing out-of-centre shopping centre currently serving a particular catchment area.
54. NLP then go on to consider sites in Bristol City Centre and the centres in South Gloucestershire. However I note that they have not considered in any detail sites in any other surrounding town centres of sub-regional importance where it could serve the sub-regional catchment (for example Gloucester, where a new city centre development is planned, or Swindon where a substantial site for a planned town centre development has been identified). This is a significant omission.
55. In assessing sites in Bristol City Centre, NLP have considered only the BCAP allocated sites KS02 and KS03; and have assessed each in isolation. They have concluded that neither is large enough to accommodate 'the proposed development'. However this is unproven, as no design studies of either of these sites have yet been undertaken. Further, NLP has not considered the possibility of both sites being developed approximately in parallel, such that together they could accommodate 'the proposed development', albeit on split sites. This is a serious omission from the assessment, which invalidates its conclusions.
56. In relation to availability of sites KS02 and KS03, NLP conclude that neither site is currently available, or could meet the developer's requirement for a start on site in early 2017. However there does not appear to be any good reason why the development has to be started by that date. Inevitably city centre development takes longer than out-of-centre development on a site in a single ownership and under the full control of the developer. I consider that there is a realistic prospect that construction on at least site HS02 could start in 2017 or 2018 – if the threat of the proposed major extension of The Mall is removed. In any event, even a start of construction in 2019 would be sufficient to enable the city centre

¹⁰ The government's policy of Town Centres First was recently re-emphasised to local authorities by Ministers in the DCLG 'Planning Update Newsletter' dated January 2015.

development to accommodate the capacity forecast in the Retail Study at 2021. I therefore consider that NLP's conclusion that the city centre sites are not available at an early enough date is unsound. A developer is already starting to prepare development proposals for site KS02; but it is unlikely that these would be progressed in the short to medium term if planning permission was to be granted for the proposed major retail extension of The Mall.

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Town Centres & Retail Planning Consultant

20 February 2015

ANNEX 2

Bristol City Council Strategic Transport Transport Development Management Application Response

Response: Initial Response

Recommendation: Objection

The above application has been submitted to South Gloucestershire Council (SGC) as an outline submission with all matters reserved. These comments comprise Transport Development Management (TDM)'s analysis of the submitted Transport Assessment (TA) with specific regard to the impact of the proposal on Bristol's highway network. As such, this report does not analyse in detail the issues of access, layout and internal circulation. However, it is recognised within this analysis that the scale and location of impact on BCC's network is directly influenced by the positioning of accesses, the level of parking provision and the level of mitigation and sustainable travel alternatives proposed as part of the development.

Background

The provision of 35,000sqm of additional retail floorspace at The Mall was previously submitted to the Planning Inspectorate for approval as part of SGC's Core Strategy examination in 2013. In his report dated 15th November of that year, the Inspector concludes in paragraph 180 that:

"it is essential the implications of expanding a major out-of-centre location are understood before decisions are taken as to its longer-term role, either in meeting local needs or those of the wider area. The evidence in this respect is incomplete and the proposal at best premature. The scheme would be at odds with the NPPF which in pursuing sustainability principles promotes a town centre first approach aimed at promoting and safeguarding traditional centres."

In relation to this requirement, BCC is entitled to be made fully aware of the implications of this proposal on Bristol's highway and movement networks, particularly in terms of the assessment of draw from the surrounding area, but also in relation to the implications this has for

congestion, safety, the operation of public transport and the safety of pedestrians and cyclists. This is in accordance with the National Planning Policy Framework (NPPF) guidelines and the duty of neighbouring planning authorities to co-operate on such matters and also follows requirements set out by BCC to the applicant in a transport issues scoping meeting of 17th October 2014 which was also attended by highway representatives from SGC and the Highways Agency (HA).

TA Structure

The submitted TA forms Appendix D1 of the Environmental Statement. The TA is organised into the following sections:

Chapter 1	Introduction
Chapter 2	Existing Conditions
Chapter 3	Accessibility
Chapter 4	Development Proposals
Chapter 5	Relevant Transport Policy
Chapter 6	Multi-modal Trip Generation
Chapter 7	Effect on Public Transport Services
Chapter 8	Traffic Effects on the Highway Network
Chapter 9	Effect on the Strategic Highway Network
Chapter 10	Construction and Phasing
Chapter 11	Summary and Conclusions

In order to inform the above sections, the TA is accompanied by the following appendices:

Appendix A	CPNN Framework Plan;	Appendix H	Report on Lakeside Extension;
Appendix B	Parking Areas/Survey plans;	Appendix I	Bandwidth Plots;
Appendix C	Car Park Surveys, Jul-14;	Appendix J	Atkins Modelling Scoping;
Appendix D	Accident Data;	Appendix K	Flow Diagram 2021;
Appendix E	Bus Route Map;	Appendix L	2021 Junction Assessments;
Appendix F	The Mall Travel Plan;	Appendix M	Flow Diagrams 2031;
Appendix G	Store Extensions Study;	Appendix N	2031 Junction Assessments;

1.0 INTRODUCTION

- 1.1 This section of the submitted TA provides the rationale behind the proposals, including the intention to bring The Mall into line with current retailers' requirements whilst attempting to integrate the site better with existing and future neighbouring residential areas, including the Cribbs Patchway New Neighbourhood (CPNN). In addition to the above, the proposal intends to improve on-site facilities for public transport so that the level of sustainable travel to and from the site can be maximised.
- 1.2 In terms of analysis, the TA has utilised SGC's Core Strategy Model (CSM) to understand the impacts of the development on the surrounding transport network and mitigation is proposed where it is considered those impacts are of a material nature.

2.0 EXISTING CONDITIONS

Planning Context

- 2.1 The TA confirms the current extents of The Mall to comprise a total of 92,000sqm gross

internal floorspace of which 77,000sqm is defined as comparison goods, accompanied by 6,670 car parking spaces within surface and covered car parks. Standard opening times are confirmed as 09:30–21:00 from Monday–Friday, 09:00–20:00 on a Saturday and 11:00–17:00 on a Sunday. Access is currently taken from four locations, including two roundabout junctions on Merlin Road, a further roundabout access from Lysander Road and via Highwood Lane to the east.

Local Highway Network

- 2.2 Consideration of impact assessment within the TA is included later in this report, although it is notable that the Transport Consultant has failed to recognise the Local Highway Network in this area to include BCC's network. TDM therefore expresses serious concerns that the applicant has failed to consider the A4018 any further south from this location or indeed other corridors within Bristol upon which it may impact including as a minimum the B4056 Southmead Road and A38 Gloucester Road. This was communicated to the applicant at the pre-application stage at a meeting of 17 October and further communicated by SGC who in turn provided a scoping diagram including the locations on the highway network that were of interest to the three highway authorities.

Existing Mall Traffic Generation

- 2.3 Automatic Traffic Counter (ATC) surveys were undertaken at each of the four entrances to the Mall during early July 2014. The TA considers this time of year to be typical in terms of the level of activity occurring at the site. TDM request some evidence in support of this assumption in comparison with other weeks / months. The surveys above indicate the busiest day recorded to be Saturday (37,546 daily two-way movements, peak hour 14:00–15:00 – 3,867 two-way movements), with the busiest weekday experienced being Thursday (33,216 movements). In relation to the traditional highway peak hours, the highest recorded weekday peak hour flows occurred on a Friday, with the morning peak hour (08:00–09:00) generating 698 two-way movements and the evening peak hour (17:00–18:00) generating 2,518 two-way movements. It is however noted that these flows are not the highest weekday hourly flow. This occurs between 12:00 and 13:00 on a Thursday (3,453 two-way movements). It is also noted that the busiest hour recorded over the whole week occurred on a Sunday between 12:00 and 13:00 (4,654 two-way trips), and this would appear attributable to be attributed to the condensed hours of trading on this day of the week.

Existing Customer Mode Share / Postcode Information

- 2.4 This data was requested by TDM at the pre-application highways / transport meeting of 17 October 2014. Whilst BCC note that some retail visitor mode share information is provided later in the report, this needs to appear in the Existing Conditions chapter of the TA, along with the geographical draw of visitors to the site if reliable forecasts are to be made about the impact of the site in future years.

Existing Mall Parking Accumulation

- 2.5 Table 2.3 of the TA provides a summary of the parking accumulation at the site, also during July 2014. During the weekdays surveyed, the busiest period was recorded to be between 13:00 and 14:00 on a Sunday (4,346 vehicles parked) compared to the highest Saturday accumulation during the same hour of 3,690 vehicles and a highest weekday

accumulation of 3,596 between 12:00 and 13:00 on a Tuesday. Given the total number of parking spaces available (6,670), this indicates that when the car park was at its busiest, there were still 2,324 empty spaces.

- 2.6 In common with the request made in paragraph 2.5, this has not been considered in the context of the time of year surveyed and further data is required to understand how this demand alters over the course of the year to allow for robust forecasting to be made, particularly in the lead up to the Christmas period and also the school summer holidays, during which increased levels of attraction experienced go considerably beyond the traditional term-time peak hours of demand. This was requested and minuted during pre-application discussions with the applicant's consultant and requires to be addressed.

Accident data

- 2.7 Paragraphs 2.32 – 2.42 of the TA provide an assessment of accident records for the M5 junction 17, Lysander Road, Merlin Road and the A4018 Cribbs Causeway. No assessment has been provided of Bristol's highway network and this requires to be revisited.

3.0 ACCESSIBILITY

- 3.1 This section of the TA provides an assessment of the current accessibility of The Mall in relation to the walking, cycling and public transport connections which connect to the site.

Walking and Cycling

- 3.2 Whilst the application site is not located within the Bristol, BCC has a direct interest in this matter. The reason for this is that any failure to provide high quality and safe alternatives to car travel in this location is likely to increase the level of vehicular traffic generated by the proposals and in so: a) maximise the number of car trips that are generated by the development; b) in doing do cause previously avoidable delay to public transport services, impacting the urban area as a whole; and of most concern: c) increase a form of development that is overly reliant on the private car whilst failing to provide for active travel amongst existing and new local communities to the detriment of all of the above.
- 3.3 Despite the recognition that walking is the most important mode of travel at a local level for journeys within 2km, the conclusion that *"the pedestrian environment in the vicinity of the proposed development is good"* is vastly optimistic and entirely inaccurate. This is evident from Appendix C of the previous Travel Plan which is submitted as Appendix F to the TA, where a plan of walking and cycling routes confirms the need for pedestrians to 'take care crossing' at numerous uncontrolled crossing locations to access The Mall.
- 3.4 The footways in this vicinity for the most part run alongside dual-carriageway roads carrying a high volume of fast-moving traffic, taking pedestrians on a circuitous and inhospitable long-way round to reach whichever destination they are attempting to access. With the exception of the current tunnel under Merlin Road to reach the Leisure Park, safe crossings of the dual carriageway or the roads leading to The Mall are absent from all junctions that serve the site and lead pedestrians into precarious situations, absent of traffic control and often on approaches to and exits from major roundabouts

where motorists are concentrating on exiting the junction and accelerating. Even where signal control is provided (as at the Merlin Road / Lysander Road roundabout), there are no crossing facilities for pedestrians other than footway dropped-kerbs which stop abruptly at the junction approach, expecting pedestrians and cyclists to cross up to three lanes of traffic, which often means walking between the bonnets and boots of vehicles, unsighted from motorists in adjacent lanes. This is not acceptable in terms of current policy and highway design criteria and the applicant has suggested no mitigation in this location.

- 3.5 Whilst TDM note that the development proposes a traffic-free bridge to address some of these issues, the site should be demonstrated to be accessible by high quality links from all directions. In relation to access to the site from further afield, and in particular cyclists, whilst those on a bicycle are able to use the footways that do exist, these footways will not be of suitable width to accommodate the increase in walking and cycling that is expected and relied upon by both CPNN and this proposal and is likely to result in conflict. Given that the TA recognises a reasonable cycling distance to be 5km, it is therefore of significant failing of the TA not to recognise the constraints to active travel that is apparent along other routes which are adjacent, including Hayes Way, along which provision of footway or cyclist provision is entirely absent.

Public Transport

- 3.6 A summary of the bus services that serve The Mall is provided in the TA although this site being the largest bus interchange in South Gloucestershire is not the major influencer of travel patterns that the TA describes given the low public transport patronage generated by The Mall in comparison with other major retail centres in the BCC / SGC area which are more accessible and offer more frequent and fast connectivity to the wider urban and regional area. This matter is in the process of being partially addressed as part of the MetroBus North Fringe – Hengrove Package (NFHP). However, this scheme will only provide linkage to central and south Bristol. The need to improve public transport offer at The Mall cannot be overlooked and BCC note the applicant's intention to reconfigure public transport access to this site in view of the current poor facilities which do very little to encourage bus use. The applicant's suggested remedy to this current constraint is considered later in this report.
- 3.7 In relation to rail, the nearest existing station to the site is Patchway, which is some 3.7km or approximately 45 minutes-walk from the site. However, even if the nature and quality of the pedestrian / cycle route from this station is vastly improved and/or new/existing bus routes are timetabled to coincide with train arrivals, TDM officers do not consider rail access from either Patchway or Bristol Parkway to provide a realistic regular alternative to car use, given the additional potential delay that is caused by adding a second mode/leg to the journey.

4.0 DEVELOPMENT PROPOSALS

- 4.1 This section of the TA confirms the land uses and floorspaces sought by the application and confirms that it is not intended for the morning opening hours of the site to alter from the existing. However, it is likely as a result of the additional leisure uses that closing times will change, although the TA confirms that these details are not at present known and therefore is silent on this issue.

Access

- 4.2 In terms of access, no additional vehicular access points are proposed and no additional works are proposed at the main site access roundabout junctions from Merlin Road. This is of concern given the poor pedestrian linkage in the vicinity of the site, as highlighted earlier in section 3 of this report. Regardless of whether it is demonstrable that the current site access junctions may be able to accommodate the additional traffic demands, BCC would advise SGC that these accesses will be required to provide high quality and safe linkage for pedestrians and cyclists from all directions, notwithstanding the provision of a pedestrian / cycle bridge elsewhere.
- 4.3 In relation to internal layout, the TA confirms the proposal to build over existing car parking using a multi-decked structure to retain the 7,000 car parking spaces that are currently provided on-site. The TA confirms that this should not alter the existing proportions of departure / arrival traffic using each access junction. In relation to parking numbers, further information is provided later in the TA and in this document.

Pedestrian and cycle linkage

- 4.4 In keeping with the requirements set out in paragraph 4.2 above, the reference to improvements to pedestrian and cycle access provided in sections 4.5 – 4.7 provide little specific comfort that these linkages will be of high quality and from all directions. With the exception of the proposed pedestrian / cycle bridge over Merlin Road, the TA and Design and Access Statement (DAS) either rely on other developments coming forward to deliver infrastructure or provide only commentary on ‘strengthened linkages’ without confirming what these improvements are likely to comprise.

Public Transport

- 4.5 In relation to public transport, the improved passenger facilities at the existing bus station represents seemingly a valid intention to improve the passenger experience at The Mall although TDM views that this alone will not generate the modal shift required to minimise impact on the three highway networks in the vicinity of the site.
- 4.6 There is no evidence that the applicant has undertaken discussions with public transport providers in view of the forecasted additional attraction to the facilities from the wider area. For instance, the propensity of current shoppers to use public transport and from which locations is seriously lacking throughout the TA. The section later, titled: *7. Effect on Public Transport Services* represents a simplistic analysis for such a major development. No attempt is made to understand the origin of shoppers’ trips together with the capacity and availability of local bus routes which serve those catchments. Instead, percentage uplift has been calculated (from a low existing base, rather than an uplifted target base). This, together with the lack of assessment of customer catchment and its relationship with public transport confirms a lack of intention of this development to maximise travel by non-car modes.

5.0 RELEVANT TRANSPORT POLICY

- 5.1 This section of the TA provides a summary of the policies which are relevant to the determination of this application in relation to transport and highways. TDM has assessed this TA with particular regard to key criteria identified in Chapter 4 of the NPPF

(2012), the current Joint Local Transport Plan for the West of England (2011–2026) and the South Gloucestershire Core Strategy (2006–2027).

6.0 MULTI-MODAL TRIP GENERATION

Calculation of new trips

- 6.1 This section of the TA provides a brief investigation of similar development proposals elsewhere in the UK where it has been demonstrated that significant increases in retail floorspace do not necessarily correlate with proportionate increases in the level of visitors attracted to the centre in question.
- 6.2 TDM recognises that major regional shopping centres will exhibit differing characteristics in terms of access and locational parameters in relation to the potential variables expressed in the TA. As such, the TA provides a fairly crude assumption of a 50% increase in trips relative to the 45% increase in floorspace (22.5%) based on the assessment accepted by the Highways Agency at Lakeside Shopping Centre. There is little additional evidence to either challenge or support the robustness of this assumption. However, of greater interest to BCC is how these trips have been distributed and assigned to Bristol's network, and the methodology that supports these assumptions.

Pass-By, Linked and Diverted Retail Trips

- 6.3 In relation to the assessment of movements that are already on the highway network, either through a) already passing the site (**pass-by trips**), b) passing the site but as part of a trip to a further site (**linked trips**), or changing routing patterns from another alternative location (**diverted trips**), the TA makes reference to a historic assumption of a 30% reduction to take account of 'existing' pass-by and linked trips. However, the TA also reflects on a recent TRICS study which confirms the 30% assumption as no longer being relevant, furthermore, the 30% accepted at Lakeside is not considered relevant to The Mall in this instance given the amount of facilities elsewhere in the Lakeside basin. As a result, no further reduction is made by TTP for the purposes of robust assessment. The TA does however run with the assumption that a linked-trip reduction is relevant to the leisure and food / drink outlets, assuming that some shoppers will remain on-site to visit the non-retail uses. Provided that trips that would be solely attributed to the non-retail uses are taken account of, this would appear to be a reasonable assumption.

A2-A5 Service, Food & Drink Trips

- 6.4 Taking the above further, the TA makes the assessment that during the daytime, from Monday-Friday, the food and drink attraction is only likely to result from those who are already visiting the retail use. Similarly, during evenings and weekends, those visiting the food and drink uses are unlikely to do so without also visiting the leisure uses. Assuming the leisure uses are proposed to constitute a multi-screen cinema, bowling complex or other indoor gymnasium, spa or children's play facility, this would seem to be a reasonable assumption. However, this takes no account of the apparent principle of this development to provide a strategic hub of activity to compliment the CPNN, where it is expected / promoted that the new local population will visit this site for recreational purposes, of which dining / drinking are an integral part.

D2 Leisure Uses

- 6.5 It is argued within the TA that the D2 leisure uses are not expected to generate significant weekday peak period trips, and that the existing 'Vue' Cinema opposite will capture cinema-only trips whilst any cinema within The Mall will attract cinema-goers who also wish to go shopping. Whilst more of a planning issue, TDM would query whether the apparent overprovision of two multi-screen cinemas opposite one another is realistic or even viable. Regardless, Transport Assessments are expected to consider worst-case situations and the TA is required to consider the direct potential impact of the D2 leisure use, regardless of whether a similar use is located nearby.
- 6.6 Notwithstanding the above, and having regard to the nature of leisure uses, it would seem reasonable to assume that leisure uses are unlikely to exhibit a significant weekday traditional peak hour trip generation, other than adult-leisure facilities, such as fitness gyms, the movements for which are likely to be linked or diverted trips as part of an existing commute, whilst a cinema use would only reach a significant increase in movement at the weekend. To this end the TA only considers the D2 Leisure uses as a standalone trip at the weekend, with a 20% reduction for visitors to retail. TDM consider this to be a reasonable assumption.

Multi-Modal Forecast Trips

- 6.7 The 35,250sqm increase in retail floorspace, when expressed as a percentage of the existing 77,000sqm represents a 45% increase. As has been qualified earlier using various evidence, it is not reasonable or credible to assume that this will simply represent a 45% increase in trips and as such a 22.5% increase in trips is forecasted in relation to the additional 45% of floorspace. The summary table from the TA is included below for ease of reference:

Table 6.2 Trip generation (vehicular) of retail uses

Time Period	Existing Traffic			Additional Retail Traffic (22.5%)		
	Arrivals	Departures	Total	Arrivals	Departures	Total
Friday AM Peak hour 08:00-09:00	532	166	698	120	37	157
Friday PM Peak hour 17:00-18:00	1,184	1,334	2,518	266	300	567
Saturday Peak Hour 14:00-15:00	1,901	1,966	3,867	428	442	870

- 6.8 The above analysis draws from traffic surveys conducted in July 2014. TDM officers question whether this represents an adequate basis upon which to make future-year forecasts. There are several reasons for this which are provided below:

- i) It is not clear at present to what extent The Mall is currently fully operational in terms of units occupied and customer footfall. TAs are required to be based upon a development operating to its full potential (worst case) and TDM would expect to see some information relating to customer attraction patterns / trends over the previous years, particularly before the recent recession to understand whether the collected data truly represents a worst-case.
- ii) TDM do not consider that mid-July represents a robust period for analysis, given the upsurge in retail activity that occurs across the late autumn / Christmas period, in addition to peaks in demand that are experienced during the school summer holidays as holidaymakers stop off at The Mall en route to / from the south west. These peak periods cannot simply be stated as 'one-offs', given that they occur regularly enough to generate considerable impacts on the local highway networks. It is also noted that by mid-July the local Universities and several private schools have ceased full operation, further calling into question the neutrality of this period.
- iii) No details are provided of the length of stay of customers using car parks. This is a critical matter for consideration if the proposal is expecting to increase the amount of time that customers spend in this location as a result of additional non-retail uses. During the peak periods referred to in ii) above, it is common for the car parks to either close to or full and an adequate assessment cannot be made of these periods without the appropriate baseline data.

6.9 For the non-retail uses the following assumptions have been made which informs the data contained in the tables that follow.

Table 6.3 Trip generation methodology for all new uses

Use	Method of trip generation	Method of calculating mode share
Retail	Percentage uplift of existing flows based upon 50% increase of +45% floorspace	Existing site modal share questionnaire surveys
Leisure	Assumed: 3,500sqm cinema, 2,500sqm bowling alley, 1,620sqm gym using TRICS analysis	
Residential	CPNN assessment	2011 Census travel to work
Hotel	CPNN assessment	CPNN assessment

6.10 The methodologies confirmed for forecasting the additional traffic generated by the retail uses are commented on above, whilst the use of the TRICS database would appear reasonable to assess the leisure uses in the absence of any similar uses on the site at present. The table below is taken from forecasts presented in the TA.

Table 6.4 Trip generation (vehicles) of non-retail uses

Time Period	Leisure			Residential (150 units)			Hotel (120-bed)		
	Arr	Dep	Total	Arr	Dep	Total	Arr	Dep	Tot
Friday AM Peak	n/a			19	51	70	10	24	34

08:00–09:00									
Friday PM Peak 17:00–18:00				50	30	80	19	6	25
Saturday Peak 14:00–15:00	167	153	320	24	28	52	15	15	30
Link trip adjustment	134	122	256	n/a					

- 6.11 TDM would question the use of CPNN flows in relation to the residential and hotel uses given that they seem significantly low for the location in question. Notwithstanding the above issue, the total multi-modal traffic generation of the proposed development, as forecasted by the TA is provided in the table below.

Total multi-modal trip generation

- 6.12 The multi-modal trip generation of the retail uses has been taken from annual shopper questionnaire surveys which have been conducted over the period from 2010–2014 with an average taken across the five years studied. These questionnaires have provided the following mode splits for shoppers at The Mall:

**Car / Van: 90.0%, Bus / Coach: 8.4%, Bicycle: 0.1%,
Walking: 0.8% Motorcycle: 0.4% Taxi: 0.2%**

- 6.13 It is unfortunate that the shopper questionnaire surveys did not differentiate between car drivers and car passengers, although data was collected on the size of shopping parties between 2012 and 2014. This study concluded, on average that 45% of visitors to The Mall travelled alone, whilst for parties of 2, 3, 4 and 5+ people, this represented 41%, 9%, 4% and 1% of groups respectively. Using these statistics to generate a modal share pattern for car passengers to The Mall provides a percentage of 38.6% of current visitors travelling to The Mall as a car passenger. This has been used to inform the table below.

Table 6.5 Net forecasted additional trips as a result of expansion

Travel Mode	AM Peak Hour			PM Peak Hour			Saturday Peak Hour		
	Arr	Dep	Tot	Arr	Dep	Tot	Arr	Dep	Tot
Car Driver	149	112	261	335	336	671	600	604	1204
Car Passenger	94	38	132	200	225	425	426	427	854
Bus/Coach/Rail	23	14	37	43	49	92	96	96	192
Cycle	2	5	6	6	3	9	3	3	7
Walk	12	27	40	26	14	40	24	25	49
Motorcycle	1	1	3	3	3	6	4	5	10
Taxi	1	0	1	1	1	2	3	2	4
Total	281	198	480	629	639	1268	1156	1163	2320

- 6.14 The above forecasts utilise 2011 Census Journey to Work data to inform the modal shares associated with the residential development, whilst the CPNN modelling has been used to define the modal share of the hotel use.

Servicing / Deliveries

- 6.15 In relation to servicing and deliveries a further 34 trips are assumed to visit the site during the hours of peak demand although it is unclear whether these are two-way flows or represent arrivals only. Clarification is sought on this matter.

7.0 EFFECT ON PUBLIC TRANSPORT SERVICES

Forecast Modal share

- 7.1 This section of the TA forecasts that the public transport mode share for the increased level of floorspace will retain the same 8.4% figure gathered from the shopper questionnaire surveys referred to above.
- 7.2 Whilst it is later qualified that this figure is likely to be an underestimation as a result of the improved bus interchange facilities and the development of CPNN and other public transport infrastructure, the TA concludes that the demand for public transport is unlikely to exceed the capacity of the existing bus network. There is no evidence to support this view one way or the other and therefore this section of the TA is vague and lacking in integrity. The assumption that rail fulfils a valid role in accommodating travel demand is unrealistic given the distance of rail connections from the site, the lack of investment in walking/cycling and the requirement to undertake a further bus journey to reach the site. This is furthered by the absence of rail travel from the completed customer surveys.

Origin of travel / mode share

- 7.3 Without the necessary calculations to support these assumptions, TDM cannot accept this analysis, given that the intention of the public transport strategy is to promote and make attractive non-car modes of travel to access the site in order to minimise the impact of the development. It is also clear that the TA makes no assessment of the geographical origin of travel to the site by mode and therefore no attempt is made to understand the relationship between existing / new visitor catchments and the public transport options that are available and how this affects modal choice.
- 7.4 The omission of modelled public transport demand represents a considerable shortcoming of the TA given that much of this work would have been undertaken as part of the CPNN G-BATS modelling work which is referred to in the next chapter and also in view of the detailed work that has been undertaken to understand and forecast the retail catchments applicable to this site.

8.0 TRAFFIC EFFECTS ON THE HIGHWAY NETWORK

- 8.1 The applicant has sought to use the Core Strategy Model (CSM) constructed by Atkins and adopted by SGC in order to test the impacts of the wider strategic growth proposed in the area, namely the CPNN. This assesses the impact of the Mall extension in 2021 and 2031. It is understood from the TA that a further Saturday analysis will be submitted in due course following pre-application dialogue although TDM are unsure whether this utilises the CSM or whether it will adopt the manual forecasting provided earlier in chapter 6 of

the TA.

- 8.2 In order to understand the distribution of additional traffic to the site, customer postcode data was shared with Atkins who were advised that “the geographical spread of the catchment area for visitors to The Mall was not expected to be materially affected by the proposed development” (parag 8.9). This assumption is made on the basis of the shopper survey and the findings of the Retail Impact Assessment carried out by NLP in September 2014.
- 8.3 TDM question this assumption, given that it is quite clear that the increased facilities proposed are likely to have a significant and differing impact upon a number of surrounding retail town and city centres in the south west as well as South Wales. The Transport Assessment unfortunately fails to visit this matter in any sufficient detail in order to allow the local and strategic highway authorities to corroborate what, on the basis of what is presented in the TA, appears only as an assumption and advice is therefore sought from planning colleagues.
- 8.4 A Select Link Analysis is presented within Appendix I of the submitted Transport Assessment which provides an assessment of the level of additional traffic that is forecasted to be generated by The Mall expansion during the weekday PM peak hour period based on the 2021 CPNN modelled scenario.
- 8.5 However, TDM officers note that the bandwidth plots contained within Appendix I are labelled 2016 whilst the text in paragraph 8.11 refers to 2021. Clarity is therefore required on which year these outputs are provided for. The data is split into arrival and departure trips with the flows with and without The Mall expansion presented below. This is produced below for reference although the question above remains outstanding and BCC would expect these diagrams to be revisited (if necessary) for 2021 and 2031, as explained in paragraph 8.8 of the TA.

Table 8.1 Weekday PM peak – Mall traffic generation on BCC highway network

Location	Direction	No expansion	With expansion	Net	Net (two-way)
A4018 Wyck Beck Rd, north of Crow Lane	Southbound	344	385	+41	+96
	Northbound	302	357	+55	
B4055 Station Rd, south of A4018	Northbound	103	131	+28	+28
A4018 Passage Road, south of Crow Lane	Southbound	278	304	+26	+70
	Northbound	255	299	+44	
Knole Lane, east of A4018	Eastbound	29	34	+5	+11
	Westbound	6	12	+6	
Crow Lane, west of A4018	Westbound	23	30	+7	+10
	Eastbound	12	16	+4	
B4056 Southmead Road, south of A4174	Southbound	56	123	+67	+88
	Northbound	7	28	+21	
A38 Filton Road, south of A4174	Southbound	18	33	+15	+18
	Northbound	7	10	+3	

*arrival trips in grey, departure trips in white

8.6 The CSM analysis forecasts that 230 additional vehicles will use Bristol’s highway network to enter and exit The Mall during the weekday evening peak hour period. Of this figure, 107 are predicted to be trips that arrive at The Mall whilst 123 are predicted to be trips departing The Mall.

8.7 To put the above figures into context in relation to the proportional geographical assignment of Mall traffic, TDM has derived the following outputs from the strategic modelling outputs reproduced in the TA. Routes outside of Bristol are shaded in grey. Again, subject to confirmation of the actual scenario year presented, these figures may change as a result of differing traffic patterns brought about by additional background development (for example CPNN). The forecasts below predict that 39% of arrival trips and 33% of departure trips would use Bristol’s highway network to access / egress The Mall.

Table 8.2 Geographical Assignment of Total Mall Traffic – Weekday PM Peak
BCC Highway network trips in white, SGC / HA in grey

Expanded Mall Total Arrival trips			Expanded Mall Total Departure trips		
Route	No.	%	Route	No.	%
From The Laurels	36	2%	To The Laurels	8	0%
From A4018 south of Lysander Rd (Henbury)	504	36%	To A4018 south of Lysander Rd (Henbury)	385	23%
From B4056 south of A4174 (Southmead)	29	2%	To B4056 south of A4174 (Southmead)	123	8%
From A38 south of A4174 (Horfield)	10	1%	To A38 south of A4174 (Horfield)	33	2%
From Filton Avenue south of A4174 (Horfield)	2	0%	To Filton Avenue south of A4174 (Horfield)	n/a	0%
From A4174 Ring Road (Stoke Gifford / MoD, UWE)	2	0%	To A4174 Ring Road (Stoke Gifford, MoD, UWE)	16	1%
From Gypsy Patch Lane (Parkway)	91	7%	To Gypsy Patch Lane (Parkway)	68	5%
From Stoke Lane (Patchway)	0	0%	To Stoke Lane (Patchway)	20	1%
From A38 North (M5 / Thornbury / B. Stoke)	3	0%	To J16 (M5 / Thornbury / B. Stoke)	89	5%
From Patchway (Coniston Road)	33	2%	To Patchway (Coniston Rd)	76	5%
From M5 north (via J17)	421	30%	To M5 north (via J17)	327	20%
From Easter Compton / Over via J17	78	6%	To Easter Compton / Over via J17	138	8%
From M5 south (via J17)	192	14%	To M5 south (via J17)	371	22%

TOTAL	1,401	100%	TOTAL	1,654	100%
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8.8 In consideration that the TA relies on two separate methodologies to forecast understand the impact of the proposals, TDM have sought to provide a comparison between the levels of traffic that are forecasted in Chapter 6 of the TA using a manual methodology (a 22.5% uplift in current flows + TRICS data for the non-retail uses) and the wider strategic model assessment, using the CSM, referred to below as the GBATS forecast.

Table 8.3 Manual / GBATS forecast comparison – Weekday PM peak hour

Source	Scenario	Arrivals	Departures	Total
Traffic Surveys	Existing Mall	1,184	1,334	2,518
Manual Forecast	Expanded Mall net additional	335	336	671
Manual Assessment – Total Mall Traffic		1,519	1,670	3,189
G-BATS Forecast (year to be confirmed)	Existing Mall	1,107	1,298	2,405
	Expanded Mall net additional	294	356	650
GBATS Assessment – Total Mall Traffic		1,401	1,654	3,055

8.9 The above analyses are broadly similar in relation to departure traffic although there is a notable difference of just over 100 trips when the same parameters are compared for arrival traffic. This confirms the GBATS model to forecast 134 fewer trips during the weekday evening peak hour period.

CSM Assessment outputs

8.10 As referred to earlier, the TA draws upon the outputs of GBATS modelling undertaken on behalf of the applicant by Atkins. This has sought to test the impact of the development at both 2021 and 2031. Some detail is provided of the modelling parameters used within these model runs and this is summarised below:

Table 8.4 Committed Development and infrastructure assumptions used in GBATS

Committed developments	2021 scenario	2031 scenarios
Filton Airfield (BAE site)	588 dwellings	2,500 dwellings
	151,000sqm employment	151,000sqm employment
Fishpool Hill	799 dwellings	1,250 dwellings
Haw Wood	526 dwellings	1,000 dwellings
Patchway Trading Estate	116	1,000 dwellings
CPNN Transport package	None, other than junction accesses	Full CPNN package
Major Transport Schemes – (assumed for both scenarios)		
M4 / M5 managed motorways		
M5 junction 16 & 17 improvements		
Ashton Vale – Temple Meads (AVTM) bus rapid transit		
Stoke Gifford Transport Link (SGTL)		
North Fringe – Hengrove bus rapid transit (NFHP)		

8.11 In relation to the above assumptions, TDM would firstly seek advice from SGC’s planning

officers to confirm that the above assumptions are realistic in relation to housing and employment completions in the 2021 scenario.

- 8.12 The bandwidth plots that are illustrated in Appendix I and assessed in section 8.5 of this report are confirmed in the TA as forecasting the 2021 scenario. Once again, clarity is required given that the diagrams presented are labelled 2016.

Proposed new BAE site (Filton Airfield) junction

- 8.13 Before turning to the outputs presented in Appendix K of the TA, one notable difference is apparent when the assessment outputs for the Mall Expansion TA are compared with the assumptions that have been made by the planning application for the BAE Airfield site, which was submitted in October 2014. This proposal includes a new signalised T-junction to Merlin Road between the San Andreas and Christmas Tree roundabouts to access the development. This junction is however contrary to the wider CPNN masterplan and the modelling upon which the CPNN and indeed the modelling to support The Mall application has been based.
- 8.14 Such a discrepancy would call into question the validity of the modelling presented to accompany The Mall expansion in the event that this access were approved by SGC. This would have a bearing on both the strategic modelling work and also in relation to the local LINSIG / ARCADY models that have been submitted to support the application in question.

Flow Difference Plots

- 8.15 Appendices K & M of the TA illustrate the difference in total flows that are forecasted on the network with and without The Mall extension for 2021 and 2031 respectively. These outputs are taken from the wider GBATS model and relate to the weekday evening peak hour and forecasted the changes in flow across the network. These predicted differences in flows are quantified in Tables 8.2 – 8.3 for 2021 and Tables 8.8 and 8.9 for 2031.
- 8.16 The assessment of strategic modelling outputs of this nature need to be understood in relation to the context of the local highway network, its operation, traffic movement patterns and the limitations of the modelling process selected. TDM officers have noted that the following issues arise with the methodology that is employed in this section of the report.
- a) Above all, the applicant has failed to provide an assessment of the development during a neutral period of the year, as referenced earlier. Together with sensitivity testing of the peak operation of The Mall in the weeks leading up to Christmas and the summer holiday period, BCC highway officers note the following other discrepancies with the quality and robustness of the reporting submitted:
 - b) The comparison of before and after flows using GBATS SATURN model comprises a simplistic and blunt methodology for determining the wider impact of major development proposals. Consequently there is a failure to report the impact of the development on the surrounding highway network and an apparent unfamiliarity with the surrounding area.
 - c) For instance, the forecasted reduction on a number of highway links expressed in Appendix K requires explanation in view of the additional 670 weekday evening peak hour trips that are forecasted.

- d) GBATS–SATURN output plots are normally expressed as actual flows or demand flows. The difference between the two being where the highway network has failed to accommodate the demand (owing to capacity constraints). This ‘unreleased’ traffic does not figure in the flow plots;
- e) As referenced earlier, the Select Link Analyses are a key consideration and are usefully provided in Appendix I. That there are significant additional flows generated by the development on the surrounding highway network during the weekday peak hour, yet comparably minimal increases in total traffic suggests there is either a locational or time–related displacement of background traffic (peak–spreading), neither of which is addressed by the outputs or reporting;
- f) It is noted that the Transport Assessment shows minimal queuing on the junctions which are assessed using LINSIG and ARCADY in Tables 8.4, 8.5, 8.9 and 8.10. However, a baseline model does not seem to have been formulated and calibrated against observed congestion. As a result, there is no basis upon which to agree that the three junction models (all of which are on SGC’s network) presented in the TA present a realistic or sound basis upon which to forecast future year impacts;
- g) With reference to paragraph 8.31, the determination of junction modelling using the 5% threshold increase in traffic is no longer relevant or appropriate, particularly where the area being considered suffers from congestion. This is stated clearly in the 2007 Guidance on Transport Assessment;
- h) Notwithstanding the above, the TA considers the development impact at junctions as a percentage of the total flow of the junction, rather than the increase in traffic at a particular arm. This is a common practice of consultants seeking to minimise the impacts of developments and is incorrect. This requires to be rectified and revised to show the percentage impact upon each arm. In the BCC area, the analysis requires to be expanded to provide impact forecasting for the following junctions as a minimum in view of the impacts forecasted in Table 8.1 of this report:

- 1) A4018 Cribbs Causeway / Wyck Beck Road / B4055 Station Road (junction is in SGC but impacts upon Station Road in BCC)
- 2) A4018 Wyck Beck Road / Knole Lane / Passage Road / Crow Lane
- 3) A4018 Brentry Hill / Greystoke Avenue / Falcondale Road
- 4) B4056 Southmead Road / Monk’s Park Avenue / Pen Park Road
- 5) A38 Filton Road / Toronto Road / Monk’s Park Avenue

8.17 In view of the lack of confirmation of impacts on BCC’s network the above list is provided as a minimum and is produced without prejudice to other issues which may arise from alternative and/or further scenario testing which may indicate material impacts elsewhere which may impact negatively upon the safety and operation of Bristol’s movement networks.

8.18 Overall, it is disappointing that the applicant has failed to address the requirements outlined by BCC’s highway officer at the pre–application meeting in October and confirm the impact of the development on BCC’s highway network. In addition to the further work that is required to demonstrate the impact of the development during a more neutral period of the year, in addition to a Saturday and during the peak periods of demand, notably the period leading up to Christmas and Summer Holidays.

8.19 With respect to Saturday assessment, paragraph 8.47 of the TA confirms the applicant’s

intention to run a simulated Saturday model to test the impact upon the Saturday afternoon peak hour referred to earlier and an addendum TA is expected to be submitted shortly.

9.0 SUMMARY

9.1 In summary, BCC TDM officers cannot support the proposals for the following reasons:

- The proposal is considered to be at odds with the NPPF and its requirement for sustainable development.
- Transport Assessment has not taken account of BCC's requirements expressed during pre-application discussions.
- The evidence to support the assessment of baseline conditions is fragile and takes no account of seasonal variations.
- Customer postcode data is not qualified or assessed in relation to the geographical spread of trips.
- Parking accumulation is not considered in terms of current dwell times, nor is it in terms of the intention of The Mall to encourage longer stays at the site.
- The applicant has failed to assess the existing conditions on Bristol's movement network.
- The development appears to rely on a series of interventions associated with the CPNN development without providing an understanding of how the delivery of such measures will be timed accordingly to coincide, or not, with an expansion of The Mall.
- For many of the journeys accessing The Mall it is not reasonable to assume that the MetroBus or rail expansion programmes planned will serve to reduce the car reliance of the development. In conjunction with this, the TA fails to undertake a spatial assessment of current public transport trips to the site and where gaps currently exist.
- Any improvements to the Public Transport facilities at the site are not considered to generate the necessary shift in mode shares that would be required in order to deliver accessibility comparable to other major retail centres in the area.
- In relation to the food and drink uses, the TA assumes that all visits to these facilities will only be taken from trips already forecasted to be generated by the retail offer. This is in direct contradiction to the principle to create a facility that serves the forthcoming housing developments to the south.
- The principle that leisure uses in the expanded Mall will run complimentary to existing leisure uses nearby, that is, that whilst essentially the same use, they will exhibit differing trips patterns fails to assess the worst case.
- Trip generation for the residential and hotel uses appear to be extremely low.
- Assignment of development trips does not appear to take into account the Retail Impact Assessment which provides greater clarity in terms of origin of custom, nor does it make the connection between geographical draw and modes of transport.

- Saturn Bandwidth diagrams appear to represent 2016, whilst the text in the report refers to 2021.
- There is a discrepancy in that the application for the Filton Airfield site proposes a new junction that is not assessed within the TA for The Mall expansion, calling into question the trip assignment, routing and impacts.
- Before and after flows do not present a robust enough assessment of the impacts of this major development. However, when Select Link Analysis outputs are interrogated, it is clear that the development results in a material impact upon Bristol's highway network.
- As a result the applicant has failed to demonstrate the impact on BCC's network in terms of the level of congestion, queuing and delay. This is a serious omission.
- Related to the above, the applicant has not referenced any baseline capacity assessments of the junctions that are tested, neither has it carried out queue length surveys which would be essential in order to validate the baseline outputs presented. Without this, no weight can be attached to future year modelling.
- The 5% impact threshold is no longer valid as a reason not to test a network or junction, particularly one which is subject to congestion.
- Percentage impact has been considered as a proportion of the total number of movements across a whole junction, rather than the percentage increase on one arm. This is incorrect and masks the impact of development, reducing the percentage increase every time this methodology is employed.