

WARD: Central

CONTACT OFFICER: Susannah Pettit

SITE ADDRESS: Trust Headquarters Marlborough Street City Centre Bristol BS2 8CC

APPLICATION NO: 18/04977/P Outline Planning

DETERMINATION 14 January 2019

DEADLINE:

Outline planning application to consider Access and Scale (with Appearance, Landscaping and Layout reserved) for the demolition of all existing structures and the erection of a hospital transport hub, comprising a 400-space Cycle Centre, 820-space hospital-only car park, hospital bus drop-off point and associated works (Major).

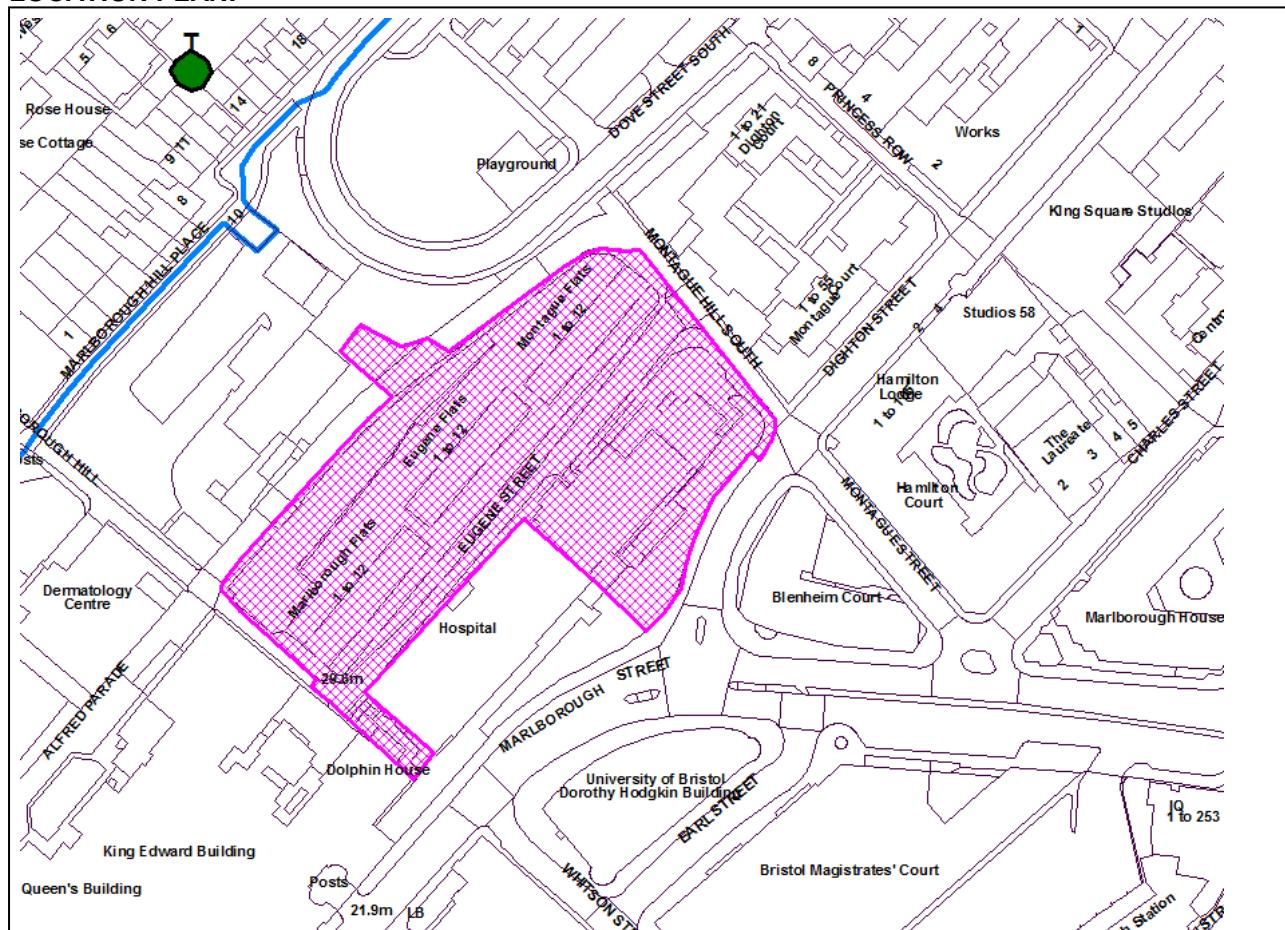
RECOMMENDATION: Refuse

AGENT: WYG
90 Victoria Street
Bristol
BS1 6DP

APPLICANT: UBH NHS Foundation Trust

The following plan is for illustrative purposes only, and cannot be guaranteed to be up to date.

LOCATION PLAN:



Development Control Committee B – 13 March 2019**Application No. 18/04977/P : Trust Headquarters Marlborough Street City Centre Bristol BS2 8CC****SUMMARY**

This application is made by the University Hospital Bristol Trust. It is an Outline application, seeking approval for Scale and Access only, leaving Appearance, Layout and Landscaping to Reserved Matters.

The application seeks approval for an eight storey car park ('Transport Hub') on the block bounded by Eugene Street, Marlborough Hill South and Marlborough Hill. The application would include the demolition of 3 blocks of flats on Eugene Street, which are on the Local List.

The Hospital Trust have set out that there is a need for the transport hub since many of the patients travel a significant distance, with the hospital being the regional centre for paediatric burns and brain injury, cancer and adult cardiac services and the Children's Hospital. In addition, a number of patients and visitors are unable to use public transport, and require nearby car parking, frequently finding it difficult to find parking spaces which results in stress and missed appointments.

In assessing the supporting documents for an Outline application, officers are required to reach a view on the overall principle of development as well as those matters that have been applied for - in this case Scale and Access. In reaching this view, matters of principle for this application include Transport, Amenity, Sustainability, Design, Heritage and Trees, and officers have concluded that the application contains insufficient justification or mitigation for the type of development proposed, such that it would bring about unwarranted harm.

A significant number of responses have been received to public consultation, with strong letters of both support and objection. There have also been objections from Councillor Smith, Councillor Negus and Councillor English.

Members will see from the report that officers have considered all the issues and have come to a recommendation of refusal, recognising that as with any major scheme there are a number of competing demands.

The recommendation is to refuse the application on the grounds of Transport, Air Quality, Loss of Housing, Heritage/Design, Amenity and an unmitigated loss of trees.

SITE DESCRIPTION

The application relates to a piece of land owned by the University Hospital Bristol Trust, ("The Trust"), bounded by Montague Hill South, Marlborough Hill, Marlborough Street and Dighton Street. The site also encompasses Eugene Street.

The application site plan encompasses an existing 3 and 4 storey multi-storey car park, which is accessed from Montague Hill South, as well as the residences in Marlborough Flats, Eugene Flats and Montague Flats - 36 flats in total. These buildings are three storey, red brick inter-war residential properties. According to the application supporting documents, 8 of these are uninhabitable. The properties are Locally Listed, undesignated heritage assets.

The hospital precinct is predominantly arranged to the south and south-west, with student accommodation and the Magistrates Court to the south-east. Prevailing building heights within this area are between 6-8 storeys. To the north and east the buildings drop down to a smaller scale with more residential uses as the land rises up Dighton Street. There are relatively steep level

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changes across the site, going from south-east to north-west.

In terms of policy designations, the site is within the City Centre, the Hospital Precinct, and the St Michael's neighbourhood as defined by the Local Plan. The site is not within a conservation area, although it is close to the Kingsdown, Stokes Croft and St James Parade Conservation Areas which are all roughly equidistant from the site. The nearest listed buildings are Grade II listed Montague Court, Montague Hill South (2 Dighton Street), and nos. 1-4 (consec) Marlborough Hill Place to the north west. There are a number of trees on and around the site, most notably, a row of category B trees along the northern edge of the site to the rear of the Eugene Street flats.

RELEVANT HISTORY

A pre-application enquiry (BCC ref: 16/00820/PREAPP), seeking advice on the same development as proposed here, was responded to on 11 April 2016.

Advice was that the proposal would appear to run counter to Bristol City Council's commitment to reduce car trips. It was advised that a robust case would need to be put forward before the principle could be accepted, with the applicant being advised to focus on the following aspects: traffic modelling, assessment of key junctions, strategy for decommissioning existing car parks, review of Travel Plan, air quality management, mitigation for the loss of affordable housing units on site, design quality, overshadowing, sustainability and community involvement.

Application at The Glen Hospital, Redland Hill (BCC ref: 17/00799/F)(which the applicant uses as a comparison).

Planning permission was granted on 19.04.18 for the erection of a 3 tier (four storey) decked car park above the ground floor level with associated landscaping works to provide 263 car parking spaces (including car sharing and car pool facilities), 14 disabled parking spaces and 4 electric car spaces along with further 22 cycle parking spaces.

APPLICATION

Outline planning permission is sought, to consider Access and Scale only (with Appearance, Layout and Landscaping reserved for future applications) for a multi storey transport hub containing 820 car parking spaces and 400 cycle parking spaces. The transport hub would be for hospital use only.

The transport hub would be 8 storeys high (when seen from the south) would be positioned on the block between Eugene Street and Montague Hill South. The vehicular access to the transport hub would be from Eugene Street at ground floor level, with the exit onto Montague Hill South from level one.

Access to the car park would be restricted to hospital patients, staff and visitors. The application indicates that technology such as barcodes on letters would be used to restrict public access, and that there would be charges in place at the same rate as existing car parks on the site. 34 car parking spaces would be for disabled users, the remaining 786 spaces would be standard spaces, 16 of which would be for EV. The disabled parking facilities would be at each end of the building at the internal circulation hubs. A staffed information centre would be available.

The proposal also includes a new shuttle bus stop, cycle and changing facilities, reception area and upgrades to the surrounding public realm, to include a landscaped area and improvements to Marlborough Hill steps.

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The residential buildings on Eugene Street would be demolished to make way for the proposal, with Eugene Street becoming the access road into the car park and remaining as public highway. Montague Hill South (which is currently a private road) would continue to be open for through traffic between Kingsdown and Dighton Street.

The application documents set out that the need for the car park stems from a lack of parking currently on the hospital site, and that the UHB's Estate Strategy 2015-2020 indicated a proposal to create around 1,300 additional parking spaces. Patient feedback surveys have indicated that the lack of parking is the biggest cause of distress for patients, and that trying to find a car parking space often means patients are late for appointments or miss them entirely. These delays and missed appointments impacts on the care that can be provided for the patients concerned, as well as appointment times for other patients and generally the efficient running of the hospital.

The Hospital currently has parking for 349 spaces in 22 car parks surrounding the hospital campus. The application sets out that 4 car parks (containing 192 spaces, of which 31 are disabled bays) would be closed upon delivery of the proposed transport hub. With the closure of these car parks the total uplift in spaces would be 628. These car parks are at MEMO (on Eugene Street); the existing Trust multi-storey car park within the site; (which is proposed to be demolished upon delivery of the Transport Hub); Estates Road and SWEB (on the north side of Montague Hill South). The application contains no information on what the intended uses would be for the decommissioned car park sites, including the one within the application site.

The application supporting documents state that the proposal would not result in any more vehicles on the network than currently exist as there would be no change in activity levels. The application is made on the basis that the proposal would remove the need for people to drive around the local area looking for a parking space as they would be assured of a space within the new car park.

The application is supported by the following drawings and supporting documents:

Air Quality Assessment
Heritage Statement
Statement of Community Involvement
Sustainability Statement
Transport Statement
Travel Plan
Tree Survey
Planning Statement
Design and Access Statement
Drawings showing Access and Scale
Indicative drawings showing layout and elevations

EQUALITIES ASSESSMENT

During the determination of this application, due regard has been given to the impact of the scheme in relation to the Equalities Act 2010 in terms of impact upon key equalities protected characteristics. These characteristics are age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation. This application could impact upon some groups with protected characteristics. Whilst there is potential for benefits for groups with protected characteristics, these benefits are weighed against the harm, and the issues are given significant weight. This balance is explored in the Key Issues section of this report.

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PRE APPLICATION COMMUNITY INVOLVEMENT

Due to its size, the application is required to be accompanied by a Statement of Community Involvement. Guidance and good practice examples exist to inform the choice of appropriate methods in order to help ensure effective, efficient, transparent and accountable community involvement. Those responsible for undertaking community involvement are expected to reflect such good practice to ensure inclusive, fair and effective initiatives. Failure to do so may limit the validity and relative credibility of the involvement undertaken.

The application is supported by a Statement of Community Involvement (dated September 2018) which has been assessed. The Statement of Community Involvement shows that the applicant undertook a comprehensive exercise, using a number of outreach processes. The process and outcomes of the SCI are summarised below:

i) Process

- The applicant undertook community engagement in 2017/2018. Firstly, they identified groups for engagement. These were, local elected members, patients' groups, community stakeholders (First West, Bristol Civic Society, Kingsdown Residents Association, Christmas Steps Arts Quarter and Hartcliffe and Withywood Community Partnership) and residents from the surrounding area.
- Members were also taken on tours of the University Hospital site and the BRI.
- A Patient Transport Survey was carried out, and the results showed that 57% of respondents visited the hospital by car.
- A public exhibition was held on 19 July 2018, and 2,772 letters were sent to residents living locally, and a further 8,000 letters were sent to Trust members, charities, community health groups and councillors. A press release was sent to the local media to advertise the exhibition. Feedback forms were available at the exhibition.

ii) Fundamental Outcomes

- Number of existing car park spaces is insufficient

UHB response: Planning policy would allow 2,000 spaces, but the Trust are committed to the Travel Plan which encourages sustainable modes of transport

- Uncertainty over the need for more hospital car parking - is this facility for convenience or medical necessity?

UHB response: There is a need for parking availability close to the hospital for patients with a medical need, such as patients with Leukaemia for whom the threat of infection is high and cannot use public transport. An analysis of numbers of such patients has informed the planning application.

- Concern that the Transport Hub would encourage car use and discourage cycling and public transport use;

UHB response: UH aims for at least 53% of patients and visitors to continue arriving to hospital via public transport. The car park would not result in any more vehicles on the network than currently exist. The Trust's Travel Plan is being updated to reflect a greater emphasis on recommending sustainable forms of transport.

- Concerns over air quality impact

UHB response: People would not have to search for spaces. An air quality assessment forms part of the planning application.

- Concern over access from the Hub to the main hospital

UHB response: Marlborough Steps would be improved although we appreciate that this presents

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challenges to more vulnerable patients. If planning permission were to be granted, we would explore moving vulnerable patients around the site using electric buggies.

- Concern over patient and visitor access to the Hub;
- Uncertainty over the need for more hospital car parking;
- Concern that the Transport Hub would encourage car use and discourage cycling and public transport use;
- Concern over loss of UH Bristol-owned housing on Eugene Street.

UHB response: The Trust purchased the flats from BCC in 2009 without conditions, for the purpose of hospital related development. The Trust is not a housing developer and money needs to be spent on providing healthcare services. Tenants of these flats have only ever agreed 6 month leases since the sale. To mitigate this impact, full packages of support would be provided for tenants who would be required to move away from the Eugene Street flats, including a three month notice period.

Aside from the negative concerns raised above, the SCI reports that 90% of the respondents were either in favour of the proposals or in favour in principle with some issues.

RESPONSE TO PUBLICITY AND CONSULTATION

Letters were sent to 597 nearby neighbours and occupiers on 05.11.2018. A site notice and a press advert were also both posted on 14.11.18. The 21 day period given to comment expired on 05.12.2018, although a large number of representations were received after this date and are considered within this report.

In total, 239 objections were received, and 169 letters of support. 9 neutral comments were also received.

OBJECTIONS ARE SUMMARISED:

- Kingsdown Conservation Group: Objection (summarised)

The proposal conflicts with the Bristol Core Strategy and the joint transport plan. The desire to demolish 36 fundamentally sound, purpose built flats is repugnant, and the desire to build another multi-storey car park on the site is offensive. The Trust should integrate its thinking and decision making with the existing parking provision and Bristol's emerging transport strategies. The mass, height and length of the proposed car park would assault Kingsdown's surviving historic townscape by being built to an entirely different scale and at a low level of the escarpment. Views in and out of the conservation area would be obstructed. Both the Grade II Listed Montague Court and the locally listed King Edward VII Memorial Hospital building are immediately adjacent to the proposed car park and the setting of other heritage assets that are in the Stokes Croft and St James's Parade conservation areas would be substantially harmed by the brash new building.

There are no views from the west end of Dove Street or Dove Street South. There is no section drawing showing the car park in relation to the topography of Kingsdown.

- Conservation Advisory Panel: Objection

The Panel considered that the supporting documents had been written at the end of the design process and written on behalf of the client rather than as an objective analysis. The statements failed to note the fact that the site was a part of a landscape of garden houses from the 17th Century onwards. Reference should have been made to the recent English Heritage study of Bristol Town Houses and the desktop study submitted for alterations to no.6 Kingsdown Parade on the hillside above, and appropriate strategies suggested for the recording of any such remains that

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might be revealed in the proposed development.

The proposals would have adverse affects on the setting of several listed buildings, including Montague Court and Charles Holden's locally listed Edward VII Memorial Building and would be seen from at least three conservation areas. This enormous building at the foot of the escarpment would be an offence to the topography. The Kingsdown conservation area character appraisal referred to views out of the area and this building would have an adverse impact on these views. The loss of the existing key worker houses was objectionable.

In summary, these proposals were the final coup in destroying the Kingsdown hillside.

The Panel strongly objected to the proposals.

- Bristol Civic Society: Objection (Summarised)

The existing car park would be demolished, and this could continue to serve its purpose. The loss of the 36 flats would be a retrograde if the car park becomes obsolescent. The Trust's comparison of its parking capacity against hospitals of a similar size leads to a false conclusion as most hospitals built in the 20th Century are suburban. A better comparison would be older, city centre hospitals. These have not increased car parking provision, but instead have developed bespoke hospital access park and ride schemes. The increase in on-site parking is certain to attract more private cars into the city centre and add considerably more traffic and pollution in the city centre. The introduction of a filter light on the north of Marlborough Street would harm the character of the area by removing an area of green space. It would be an additional obstacle for pedestrians and would give traffic a priority over them which is contrary to BCS10.

The Trust has degraded the Eugene Street properties through lack of maintenance. Their 2009 purchase from the Council is not a planning consideration.

TRAFFIC AND TRANSPORT RELATED OBJECTIONS:

- As a staff nurse living in Clifton I struggle to get buses to and from work and this proposal will make it harder. The plan has not considered the staff who work hard to keep the hospital running. The proposal is great for patients and visitors, but better transport links are needed for the whole of Bristol.

- The application is in direct opposition to the Council's planning policies and will remove valuable housing and increase traffic in the centre of Bristol. It will also increase already dangerous airborne pollution levels around the hospital. Alternative options should be selected - for example, improving the bus services to the hospital, and getting buses more of them to stop outside the building. The existing shuttle bus service could also be improved.

- There is already heavy traffic on the streets around the site, and within 5 minutes' walk there is an NCP car park and Trenchard Street car park that are nearly never full. The already congested road junction would be exacerbated and prevent access for emergency vehicles.

- The traffic analysis does not consider traffic circulation properly. This proposal would concentrate all private car access traffic onto the Marlborough Street corridor. Adding more traffic onto Marlborough Hill would be unacceptable. The BRI is a city centre hospital - it cannot provide parking to everyone and trying to is very old-fashioned thinking. There are other better ways to help with transport difficulties. We need fewer car journeys in Bristol, not more.

- By making it easier to park the hospital would encourage more people to drive to Bristol.

- The proposal would lead to an increase in traffic due to the proposal - from increased hospital attendances as well as freeing up space in Trenchard Street car park for vehicles associated with local commerce. The traffic and air quality assessments state that the development will not lead to an increase in hospital/patient journeys. If this is the case, the size of the car park is not justified.

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Conversely, if it is justified, then it will lead to increased car journeys

- We are short of living accommodation in Bristol, and we are over-run with cars. If the housing is no longer required for NHS staff, then make it available for the homeless. If access to the BRI is a problem, then provide more and cheaper public transport.
- The proposal is counter to National policy as well as the Joint Local Transport Plan and emerging Bristol Transport Strategy which both aim to reduce the volume of traffic in the centre of Bristol in order to support more sustainable transport choices, particularly with regard to the air-quality considerations for pedestrians and cyclists. Alternative solutions to tackle how patients and visitors access hospitals should be sought by the applicants, including hospital buses and park and ride options. It is disappointing that as a health organisation, major developer and employer in the area, the UHB Trust have not been more pro-active in supporting healthier and more sustainable solutions.
- Despite the inconvenience caused for some members of the public and hospital staff, more physical activity, not car use, needs to be encouraged for the long term improvement of community health.
- To reach my home on Marlborough Hill I can drive up Montague Hill South, and access Marlborough Hill from Eugene Street. It does not appear that this access would be available if this development goes ahead.
- There is no necessity for a car park to resolve patients' transport problems. The existing free bus service should be extended and improved. Free shuttle buses should link not only with the railway station but also with the metro bus network. A taxi service would be feasible in the future with cheaper, driverless taxis. Discussions about improving existing bus services should be had with the operators now, and not just when the proposed car park is open. There are already several services to help including Dial-a-Ride, the Patient Transport Service, Volunteer Services and the Shuttle. It would be preferable to build on these facilities.
- If in the future, a congestion charge is introduced, the car park would become obsolete
- One of the main reasons cited in the application is to provide parking for disabled patients, yet there are fewer than 5% of spaces allocated for disabled patients.
- Whoever wrote and reviewed the phrase in the transport statement "public transport may be an option for some non-medical necessity visitors" needs to be sent on a disability awareness course. Better public transport, walking and cycling to the hospital will help everyone, no matter what their disability is. Driving is a privilege and could be revoked.
- There is no awareness in the application of how unpleasant the immediate area around the BRI is - so no consideration on how the design could make things better such as looking at how people walk to the hospital and why it takes so long to cross from the bus station. There is no attempt to address these issues.

Bristol Traffic Project: Objection

Cycle links around the hospital should be improved. There are flaws in the transport and air quality modelling. The proposal would endanger the health of citizens and patients. -The proposal would give rise to dangerous levels of NOx within the wards. Were medical staff consulted on this proposal? It would fall foul of the General Medical Council's good medical practice guidance to "make the care of the patient your first concern"

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The hospital needs better pedestrian access to, through and around it, it needs better transport connectivity and a people-focused transport interchange without excessive parking. The Travel Plan has a number of shortcomings. It does not acknowledge the hilly nature of the location, the uphill walk from the centre, limited number of entrances to the main hospital, or the complex pedestrian routes through the buildings. It does not cover the problems of getting to the site from bus stops or railway stations. It undermines any attempt to model the travel behaviours or visitors/patients that would allow evaluation of current patterns to look at alternative measures. Its only aim is to provide information.

The sustainability statement does not consider the impact on climate change, and no account has been taken of the effect of a potential Clean Air Zone or congestion charges that the Council may introduce in the future.

The transport assessment contains inconsistencies; therefore we do not accept that the additional 628 car parking spaces are needed.

Proposed improvements to the pedestrian access to the transport hub are inadequate. It suggests that patients would walk from the transport hub, down Marlborough Hill, along Marlborough Street and Upper Maudlin Street to reach the main entrance of the BRI. This so called "Healthcare Corridor" is at least 200m without shelter, along a pavement next to the noise and air pollution of constant high flows of motor traffic. The planning application does not explore alternatives or how the route could be improved.

OBJECTIONS TO LOSS OF HOUSING:

- It's surprising that the hospital wants to get rid of 36 flats for key workers who do not need to commute to the hospital and replace them with a privately run car park. The application supporting documents state that recruitment and retention levels are very high, therefore there is no requirement to provide key worker accommodation. This shows a disregard for the staff and their families who currently live in the Eugene Street flats. It also doesn't take into account future uncertainty, given Brexit and the general trend of increasing difficulty of recruitment of hospital staff. There are currently 23 staff members in 27 useable flats, and some 8 are uninhabitable. This can only be due to neglect by the Trust itself which is reprehensible, but also means it could choose to make them more habitable. Bad landlord behaviour should not be an excuse for allowing them to demolish the accommodation.

AIR QUALITY OBJECTIONS:

- The air quality assessment acknowledges that air quality around the hospital will get worse.
 - This part of the city already has dangerous levels of air pollution and seriously congested roads.
- The function of a hospital is to improve the health of the public which is to a measurable extent, damaged by poor air quality. UHB needs to take short and long term air quality impacts more seriously and develop a plan that provides reassurance on avoiding any increase in traffic, air pollution and associated respiratory disease. More available car parking would generate more car journeys which in turn damage air quality and would be contrary to any clean air strategy. The proposed layout plans suggest that any increase in vehicle numbers would not be matched by improved levels of free-flowing traffic. Any future successful traffic reduction scheme in Bristol would render the development superfluous. Large city centre hospitals cannot realistically be expected to provide copious patient or visitor parking and should concentrate on alternative forms of access.

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- The Council has pledged to be Carbon neutral by 2030, therefore infrastructure that would lead to an increase in CO2 emissions should not be approved.
- It is estimated that 300 people die prematurely in Bristol due to air pollution. These proposals will worsen air quality and increase the risk to people's health.

DESIGN / CONSERVATION OBJECTIONS:

- The hub will impair irredeemably Kingsdown Conservation Area, ruining both the streetscape and historic views. It is hugely out of scale with surrounding structures and covering it in grass will not help it to fit in. It will harm the Kingsdown, St James and Stokes Croft Conservation Areas.
- The application has not properly considered its impact on the setting of nearby listed buildings
- The Eugene Street flats are an interesting architectural heritage of the 1920s.
- The link from Dove Street to Montague Hill South is already blighted by litter and graffiti and frequently dumped waste. Although the proposal for a 'Welcome Area' in Montague Hill South seems positive, I believe that this could become a further site for graffiti, rubbish and on-street drinking.
- The car park would create a physical barrier to walk into the city centre down Montague Hill
- The car park would attract antisocial behaviour

AMENITY OBJECTIONS:

- The application states that the car park would not be the tallest building in the local area, and would not give rise to any significant adverse impacts in terms of overshadowing or loss of light. This is a dismissive attitude, as clearly the development will involve the loss of light and amenity of some local residents
- The proximity of the proposed car park to numerous dwellings and the Carolina House children's playground is scandalous - both due to increased traffic and increased air pollution. It would also block sunlight from the playground

TREES AND WILDLIFE

- The proposal would involve the loss of a row of established trees on the south-east side of Montague Hill South, behind the Eugene Street flats
- The proposal would result in light pollution which could affect local wildlife

SUPPORT LETTERS ARE SUMMARISED:

- I am a local resident and fully support the plans. What is proposed is really a minimum provision. Public transport can never serve many who come to the hospital so should not be considered as a viable alternative to the car park.
- The transport hub is really necessary for patients, visitors and hospital staff on call community staff, visitor and staff bike parking. It is also a good opportunity to reconfigure the road (Montague

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Hill South) leading to the proposed hub.

- It may be regrettable that public transport is not comprehensive enough but for a hospital serving a large area for many specialist services, it is important to provide convenient and stress free access by car to the BRI.
- The proposal will go a long way to solving the problems of patients in rural areas
- Currently the absence of parking means many patients are late for appointments with the inevitable knock on effect on waiting lists and time delays which in turn wastes money
- In patient surveys, the most negative part of their care was recorded as difficulty parking
- I believe that those who oppose this scheme have never had to support someone who is very sick to get to the hospital. Frankly it is inhuman to ask those who are very ill or those supporting the very ill (which can be deeply stressful) to do so via current methods.
- As a volunteer organisation which drives elderly and vulnerable patients to the Oncology Centre and Bristol Heart Centre, the proposal would help, as all we can do is drop patients off and leave the area due to lack of parking facilities. A number of patients require assistance entering the hospital entrance and finding their way to their appointment.
- The current provision for disabled parking at the hospital, and the public car parks is very limited and largely inaccessible to disabled people due to the distance and topography of Bristol. The provision of this car park far outweighs the loss of key worker home provision and the provision of housing in the city resides elsewhere and it should not be for the UH Bristol NHS Foundation Trust to put this in front of the demand for adequate parking provision.
- The proposed cycle hub is welcomed
- I support, but the car park needs to be of a sizeable height to fit a disabled car.

The Christmas Steps Arts Quarter's Traders support this proposal. Hundreds of out-patients now clog up the spaces outside the shops in Colston Street, Perry Road, Upper Maudlin Street, Lower Park Row, St Michael's Hill and Horfield Road as well as Trenchard Street car park. The proposal would enable proper shopper customers to park, patronise the local shops, businesses and restaurants to keep them afloat in these extremely difficult times.

- UHB needs better transport links and facilities - this would aid staff and patients alike and really enhance the service UHB provides.
- As the mother of a child who had weekly appointments at the children's hospital in a wheelchair, this project is vital for those using hospital services who don't qualify for full disability status.

NEUTRAL COMMENTS ARE SUMMARISED:

- The number of disabled parking bays is very small. I support families who need to park at the hospital for emergency admissions. This is the main reason for having more car parking. The bike park is unlikely to suit the needs of staff working at the children's hospital. As a local resident I wouldn't support the development in its current form for these reasons.
- Buses are expensive and take a long time. I live 12 miles away but the bus can take 1.5 hours and cost £40-£50 per week, which means I may no longer be able to work for UHBT. This is the situation for a lot of staff.

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- Citizens Advice Bristol frequently have contact with members of the public trying to get to the hospital from city centre car parks. Dedicated patient car parking and better hospital transport links are desperately needed.

- UCL Institute for Environmental Design and Engineering

(Comments are in relation to comment from Bristol Traffic Team) We have not published the results of our investigations yet but the Bristol Traffic Team have used a statement related to our work, within their objection. The results relating to indoor areas are therefore inconclusive.

Ward Members

COUNCILLOR PAUL SMITH (objection):

It's difficult to know where to start when an application flies in the face of so many planning principles and policies:

- 1) The city centre already has sufficient car parking, this will just attract in more vehicles, increasing congestion and pollution
- 2) There is already a car park on site which is currently used for staff. If staff car parking was reallocated to another city centre car park, e.g. Trenchard Street, the issue of priority patient car parking could be addressed
- 3) The loss of 36 affordable key worker rented flats which are much needed. The trust has been degrading these properties through lack of maintenance and several are already empty and decaying. There is no provision to replace these flats.
- 4) The proposal is contrary to the joint transport plan which is being developed to deal with transport at the sub regional level. It appears that the Hospital have dusted off a 1990s car lead transport strategy when we are moving towards a 21st century transport system. It takes no account of the emerging city centre movement strategy.
- 5) This appears to be finance led not transport led with the desire to generate income for the hospital from parking when there are alternative ways of meeting their parking requirement.

- 6) The basis of the 2009 purchase is not a planning consideration and the current council is not bound by the lack of conditions in a sale made in 2009, nor is planning policy.

I could go on but I'm sure I would stray from purely planning considerations. The hospital has chosen itself to restrict the parking provision it has from patients in general and disabled patients in particular. I do not believe this is the right solution although I'm sure it has the potential to provide significant income to the Trust.

COUNCILLOR ANTHONY NEGUS (objection):

This application is for a commercial multi-storey car park which is a part of proposal that will remove car parking spaces elsewhere in the hospital estate and demolish staff housing in Eugene Street, packaged as a transport hub. It is not in accordance with the Joint Local Transport Plan, or the emerging Bristol Transport Strategy in that it encourages additional cars into the central area of Bristol and thereby worsens air quality in this most sensitive of areas where there are proposals for a clean air zone to specifically address the problems associated with too much vehicle use. In addition, this application also flies in the face of the Joint Spatial Plan with its emphasis on the provision of housing, particularly affordable housing. Instead this proposal requires the demolition of housing which has been made available to key staff. This will put more pressure on the city in general but particularly in areas adjacent to the hospital which, with other pressures from the adjacent university, will have an impact on the availability and affordability of housing for others.

The term 'transport hub' suggests a positive, multifaceted solution to an acknowledged problem of patient access to the hospital. Yet in the latest redevelopment very poor provision was made for dropping-off of patients and there appears to be no better provision of a hospital circular bus service. There has also been no improvement to the very poor commercial bus services to the BRI. There is a mis-match between a bus company operating only where it can make a profit and a

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development designed to pay for itself through a private finance process; there is a better solution which neither can achieve without a bigger view.

Finally it is particularly ironic that UBHT should have at its heart all aspects of health when this proposal for more cars coming into central Bristol with an effect on our poor air quality that will further damage health.

I urge you to reject this application and as a result hope that a more considered solution than has been presented may be found.

COUNCILLOR JUDE BREW ENGLISH (objection):

We need homes not car parks. Planning wise loss of local amenity. Pollution levels raised.

OTHER COMMENTS

Nature Conservation Officer has commented as follows:-

In the event of an approval, conditions would be recommended, requiring details of a green roof and bird and bat boxes to be incorporated within the development.

Contaminated Land Environmental Protection has commented as follows:-

The application to develop a new car park has been reviewed in relation to land contamination.

The applicants are referred to the following

- ' Bristol Core Strategy - BCS23 Pollution
- ' Local Plan ' DM34 Contaminated Land
- ' National Planning Policy Framework (2018) Paragraphs 118, 120, 170, 178, 180
- ' Planning Practice Guidance Note <https://www.gov.uk/guidance/land-affected-by-contamination>
- ' <https://www.bristol.gov.uk/planning-and-building-regulations-for-business/land-contamination-for-developers>

As this is a major application a minimum of a phase 1 desk study looking into contamination must be submitted to the local planning authority. If any information is already prepared submission prior to determination is encouraged to reduce the burden of pre-commencement conditions. Asbestos containing materials are likely to be present within the fabric of the buildings earmarked for demolition.

If not available it is recommended the standard conditions B11, B12, B13 and C1 are applied to any future planning consent.

Given the proposal is for a high rise building and the site is on a relatively steep hillside, geotechnical considerations should also be considered at this stage and it is recommended a geotechnical specialist is consulted as part of the application for reserved matters.

Energy Services has commented as follows:-

Given its location to the proposed City centre heat network, we would expect the development to connect to this heat network.

However, the Trust already operate a heat network that serves a number of the adjacent buildings so one possible option is to require this building to be connected to the Trust's rather than a BCC operated network although we would probably want to ensure that the Trust heat network is future proofed for connection to the BCC network as theirs is unlikely to become a zero carbon network without this connection

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Flood Risk Manager has commented as follows:-

A full detailed sustainable drainage strategy would be required. This should be designed in accordance with the West of England Sustainable Drainage Developers Guide available at: www.bristol.gov.uk/planning-and-building-regulations/flood-risk-drainage-and-development.

Sustainable Cities Team has commented as follows:-

Given increasing awareness and concern about the public health impacts of local air pollution in Bristol, I am concerned about a transport strategy for staff and patients which is so heavily based on the use of private cars and which is likely to increase their use in the city centre. However, in terms of compliance with sustainability policies in the Local Plan, I am not minded to formally object notwithstanding the concerns outlined above. The following comments are made :

- As indicated in the Energy Statement the numbers and calculations provided are based on high level estimates. Detailed calculations will be required at subsequent stages of the planning process.
- The Domestic Hot Water demand (DHW) for the public WC appears high. I would suggest requesting clarification of this figure at the next stage.
- Further information on the selection and use of materials will be required at the next stage of the planning process.
- Charging points for electric vehicles should be provided in line with current policy. Though not a policy requirement the applicant is strongly encouraged to provide the infrastructure (i.e. ducting and cabling) to enable the number of EV charge points to be increased over time in line with projected demand.
- The initial layouts provided suggested that disabled parking will be distributed across the floors. I recommend that the location of disabled parking bays is reviewed to ensure this meets best practice.

Transport Development Management has commented as follows:-

Objection - please see Key Issue (B).

Urban Design has commented as follows:-

CDG recommends refusal to the application due to loss of unlisted buildings of merit, impact on setting of conservation area, loss of trees about impact on townscape.

Although the design of the building and the public realm is a reserved matter, we remain sceptical whether the ambition for the quality and vibrancy of public space around what's essentially a upgraded car park will be realised.

Please see full comments at Key Issue (D).

Air Quality has commented as follows:-

Objection - please see Key Issue (C)

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RELEVANT POLICIES

Planning (Listed Buildings & Conservation Areas) Act 1990
National Planning Policy Framework – February 2019

Bristol Local Plan comprising Core Strategy (Adopted June 2011), Site Allocation and Development Management Policies (Adopted July 2014) and (as appropriate) the Bristol Central Area Plan (Adopted March 2015) and (as appropriate) the Old Market Quarter Neighbourhood Development Plan 2015.

Planning Obligations - Supplementary Planning Document - Adopted 27 Sept 2012
Kingsdown Conservation Area Character Appraisal
Stokes Croft Conservation Area Character Appraisal
St James Parade Conservation Area Boundary Review

In determining this application, the Local Planning Authority has had regard to all relevant policies of the Bristol Local Plan and relevant guidance.

KEY ISSUES**(A) IS AN OUTLINE APPLICATION CONSIDERED APPROPRIATE?**

The application has been submitted in outline form, and seeks to establish the principle of development as well as Access and Scale. Appearance, Landscaping, Layout have all been reserved for future consideration.

Notwithstanding the above, indicative plans were submitted with the application showing the anticipated appearance, layout and landscape proposals. These have not been assessed and have been used for information purposes only.

Whilst in some respects, a full assessment of the principle of the scheme needs to be concerned with Layout and Appearance in addition, officers have accepted the application as valid, and deem that the information submitted is sufficient to determine an outline application.

(B) PRINCIPLE OF DEVELOPMENT

Core Strategy policy BCS2 sets out the regional focus of Bristol City Centre's role, which, the policy states, will be strengthened by the development of office space, new homes and improved transport systems and connectivity including new public transport, pedestrian and cycle routes and transport hubs. The same policy specifically highlights that there will be continued expansion of the University of Bristol and the Bristol Royal Infirmary sites.

Central Area Plan policy BCAP11 recognises that the University Bristol and the Bristol Royal Infirmary are major institutions that make a considerable contribution to the economy and mix of uses within the city centre. It sets out that the Hospital Precinct will be developed for healthcare and ancillary uses associated with the University Hospitals Bristol Trust.

There is a critical need to substantially boost housing supply in Bristol, and this strategic priority is already supported by the existing suite of local plan policies. Core Strategy policy BCS5 sets out the need for 30,600 new homes to be provided in Bristol by 2026. In reference to existing homes, this policy requires that in order to maintain the existing housing stock, existing homes will be

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retained unless they are unsuitable for residential uses, would be used for essential local community facilities, or would be replaced.

The main land use issue for this application is therefore to consider whether the provision of the proposed transport hub, which the application supporting documents describe as being an ancillary use associated with the UHB Trust ("The Trust") would outweigh the loss of 36 homes.

For the use to be considered 'ancillary' it would need to be demonstrated that its operation relied upon a degree of interdependence with the Hospital, such that it would not be deemed a separate planning unit in its own right.

The Planning Statement supporting the application states that the car park would only be used by patients, visitors and a proportion of staff, and that technology would be used (such as barcodes on appointment letters) to prevent access by non-hospital related cars. Officers are therefore satisfied that the proposed development would be seen as ancillary to the hospital.

The applicant sets out their argument that the wording of policy BCAP11 should be interpreted to mean that development by the Hospital within the Hospital Precinct is acceptable, in view of the way it is worded - that the "Hospital Precinct WILL [officer emphasis] be developed for healthcare and ancillary uses".

Officers are in disagreement with the applicant on this matter. Policy BCAP11 states that the Hospital Precinct will be developed for healthcare and ancillary uses associated with the University Hospitals Bristol Trust and encourages the development of new facilities or the redevelopment and renewal of existing facilities. However, this policy operates within the context of other local plan policies which are also relevant to the consideration of these proposals. This policy is therefore generally supportive of hospital development but says nothing about parking proposals and does not, in the view of officers, override other policy considerations.

Furthermore, the site in question forms part of a "precinct designation" rather than a Site Allocation. Site Allocations are identified in the Central Area plan as:

"Sites to be allocated for development for particular land uses."

The same definition does not apply to the precinct designation as it is not an allocated site and is not supported by specified land uses or development considerations. It is therefore true to say that the designation is designed to encourage and facilitate development by the hospital, but not exclusively, and not when that development would be of detriment to the delivery of other local plan policies.

Notwithstanding this consideration, the only discussion within the application documents surrounding the loss of homes, is that the applicant bought the properties from the Council in 2009, and there was no condition of sale that the properties had to remain within residential use. The application documents state that the properties are in a poor state of repair, and that residents have been on short-term tenancies since the hospital purchased the properties.

It should be noted that ten of the objections received in response to public consultation are from residents of these flats who work in the hospital and object to having to find new accommodation.

The Trust states that, as a hospital, they are not required to provide key worker accommodation. It is accepted that the applicant must assess their assets and balance them against their needs, however, planning policy (including the NPPF) is clear regarding the LPA's responsibility in ensuring an appropriate supply of housing. Exceptional justification would therefore be needed to

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allow development that would lead to the loss of viable housing stock, yet the application does not demonstrate that advice offered at pre-application stage has been followed, as there has been no evidence of the Trust having engaged with this issue. The application does not, for example, give details of any maintenance that has taken place since the Trust acquired the flats, which could demonstrate that reasonable efforts had been made as to the upkeep of the properties.

In view of the above considerations, it is not considered that the need for the car park outweighs the loss of 36 residential units on this site. There is insufficient evidence to demonstrate that the residences are unsuitable for residential uses, and this is supported by the representations from residents of these flats.

Policy BCS 5 projects continued high levels of in-migration to the City, leading to negative consequences such as increased commuting into the city, increased overcrowding and an increased demand for housing to support the workforce or population pressures which would exceed supply. The loss of 36 residential units would therefore be contrary to this policy.

(C) WOULD THE PROPOSAL IMPACT ON HIGHWAY SAFETY, OR INTRODUCE A SEVERE IMPACT ON THE ROAD NETWORK?

Section 9 of the NPPF requires all developments that generate significant amounts of movement to be required to provide a Travel Plan, and the application should be supported by a Transport Statement/Transport Assessment. It also states that in assessing applications, it should be ensured that:

- appropriate opportunities to promote sustainable transport modes can be - or have been - taken up, given the type of development and its location;
- safe and suitable access to the site can be achieved for all users; and
- any significant impacts from the development on the transport network (in terms of capacity and congestion), or on highway safety, can be cost effectively mitigated to an acceptable degree.

It prioritises pedestrian and cycle movements and requires improvements to the local public transport infrastructure, requires development to address the needs of those with mobility impairment, create places which are safe and secure, allow efficient deliveries and provide for low emission vehicles. Furthermore, developments generating significant amounts of traffic require a Travel Plan. It also states that development should only be prevented or refused on highways grounds if there would be an unacceptable impact on highway safety, or the residual cumulative impacts on the road network would be severe.

BCS10 sets out development principles, and places pedestrians and cyclists at the top of the hierarchy of road user priorities. It states that proposals should minimise the need to travel, especially by private car, and maximise opportunities for the use of walking, cycling and public transport. The same policy also states that developments should be designed and located to ensure the provision of safe streets and reduce as far as possible the negative impacts of vehicles such as excessive volumes, fumes and noise. Proposals should create places and streets where traffic and other activities are integrated and where buildings, spaces and the needs of people shape the area.

Central Area Plan policy BCAP29 states that proposals for long-stay public car parking will only be acceptable where it would replace existing provision and would be appropriately located within the hierarchy of vehicular routes in the city centre. Proposals for short-stay car parking will be considered on a case by case basis having regard to the nature and requirements of the proposed development, the position of the site in the hierarchy of vehicular routes and the desirability of reducing car use in favour of more sustainable modes of transport.

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The site is located within the City Centre. It is therefore sustainable and easily accessible by a choice of transport modes. Despite this, existing congestion occurring during the day, and particularly in peak periods, results in the highway network operating beyond its available capacity to the detriment of road safety and air quality. This negatively impacts on the health and wellbeing of Bristol's citizens.

Detailed comments have been made by the council's Transport Development Management Officer, and these are available to view on the Council's website. The comments were provided to the applicant, and they were given the opportunity to respond. The Trust subsequently submitted a rebuttal to the comments by way of an additional Technical Note (TN01) and final TDM comments on this are also both online. Officers' assessment of both submissions is summarised below.

(i) Trip Generation / Traffic Impact

Trips have been modelled using patient data and surveys of visitors and staff. Staff data has not been included in additional trip generation, as it has been assumed that a similar number of staff parking spaces will be retained, so no additional trips would be generated.

Modelling of various junctions has been undertaken which indicates that there are currently no capacity issues with the highway network and that there are none proposed into the future, with the development and the background traffic growth. This has not taken into any consideration any alterations arising from the emerging City Centre Framework, and doesn't appear to have modelled the committed development at Callowhill Court. The latter includes a car park of 380 parking spaces, the size of which was reduced significantly and access redesigned from the original proposal due to a lack of capacity on the highway network.

Anyone familiar with the area would be confused by the outcome of the modelling, as this link experiences significant congestion throughout the daytime.

The proposal is for a net parking increase of 628 parking spaces. The applicant sets out that this figure is still below that allowed by adopted parking standards, however, the Council's parking standards are maximum standards, with the stipulation that where appropriate in Bristol City Centre, a significantly lower level of car parking provision will be expected.

It is clear without any modelling work that this will have a significant impact on the network, particularly concentrated on the Marlborough Street / Dighton Street node. The applicants suggest that the increase in traffic arising from this will be partly offset by the reduction in movements cruising searching for a parking space.

It is highly unlikely that this will be offset by such an extent, and the benefits of the reduction in these movements will be minimal, and will not offset the impacts of the development proposal. It is apparent from the modelling compared to site visits and knowledge and experience of the area, that the modelling is not reflective of the existing circumstances. Most significantly, the model has not been validated alongside the existing queue lengths. The models used make the assumption that the route downstream of each junction is clear and with unobstructed space for the junctions to discharge traffic into. This is not the case, as traffic can build up from the end of the M32. Capacity at all of the junctions is therefore not reflected fully in the models.

The modelling provided therefore fails to effectively demonstrate that the impact on the highway network of an additional net increase of an additional 628 parking spaces on this essential part of the highway network would not be severe.

The additional traffic and the associated congestion arising will not only have an effect on journey times, but will also have significant impact on the quality of the pedestrian environment, clear and

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unobstructed cycle routes, air quality and the ability of emergency services to use this route. It will also impact on the free flow of passenger transport on this and other parts of the highway network.

(ii) Access / Visibility

The accesses to the car park have been demonstrated to have a visibility of 2.4m x 25m, although the bus stop is in the visibility splay of those exiting the car park. This would require redesign. The principle of access at these locations depends on a number of factors, including potential queue lengths, the operation of safety barriers into the car park and the time taken to access the car park, safety reviews and visibility at the junction of Montague Hill South with Dighton Street. The safe and efficient operation has not been demonstrated, and it is not clear that the queues will not impact on the safe and effective operation of Dighton Street and Marlborough Street.

The indicative proposals for landscaping and road layout in Eugene Street suggest that it would not be considered suitable to be retained as adopted highway. It would therefore be expected that Eugene Street would be stopped up as highway, as this would no longer serve a highway function, merely access to the car park, and private servicing for the Hospital. The access for the 25 deliveries / week for King Edward Yard / Pharmacy could be maintained.

To maintain public access to Kingsdown, Montague Hill South would therefore be required to be constructed to an adoptable standard and offered for adoption. This would be a more suitable route for access by servicing vehicles, particularly into Alfred Parade, which is the main servicing access for the Hospital site, receiving 400 deliveries a week. In response to this, the applicant stated that Montague Hill South is a private road within the control of UHB and cannot be constructed to adoptable standards. This raises concerns regarding access around this site to neighbouring areas.

Marlborough Hill between Eugene Street could then be closed to vehicular traffic to take the opportunity to improve pedestrian access in this area.

A swept path has been provided of a refuse collection vehicle turning within the Alfred Hill access, which results in the rear of the vehicle touching the wall of the King Edward Building which is unacceptable. Alternative arrangements must be made or the building redesigned / footway realigned to avoid this.

(ii)(a) Pedestrian Environment

The Transport Assessment describes a walking distance of 300m from the hub, to the UHB buildings. There has been no satisfactory assessment of the existing walking environment along this route, to assess the suitability of this route for an increased number of pedestrians, especially the mobility impaired. The pedestrian environment in the area is particularly difficult and not pleasurable to negotiate. Whilst the footways along Marlborough Street are continuous, have a width of between 3-6m, and are protected from the roads with guard rails, they are also heavily used, undulating and relatively narrow, and run along one of the most congested and polluted routes in the City Centre. There is no level permeable link from this site into the centre of the precinct, and the proposal does little to address or alleviate this which goes against policy aims.

(ii)(a) Alterations to Eugene Street

Eugene Street is proposed to be the main access for all traffic entering the car park. The TA mentions the widening of footways in Eugene Street, but within the plans, Eugene Street is shown as a hybrid of a shared surface with a 1.6m footway to the south of the site, on the opposite side of the development. It also indicates shared use at its junction with Marlborough Hill. Swept paths demonstrate that swept paths cannot be achieved comfortably without the removal of kerbed areas,

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which are provided to form protected footways for pedestrians.

National guidance has recently indicated that shared spaces are not suitable for public spaces and the indicative proposals for Eugene Street are not satisfactory. The proposals for the access to the car park in Eugene Street are considered unsafe. The opportunity to make this area safe has not been demonstrated, with no definitive plans submitted. The applicant states that this aspect would be covered in the relevant application for reserved matters, however, officers consider that this is a matter of safety and access and therefore falls to be considered under this application, since Access is being applied for.

(ii)(b) New junction Marlborough Street / Dighton Street

The application suggests a potential alteration to the junction at this location, which was discussed with officers in principle prior to the scoping exercise, and which is indicated thematically in the Figures section of the Transport Statement. No safety auditing has been undertaken of the proposals. This part of the proposal would also result in the removal of trees which would be of concern, as this is not reflected in the indicative Tree Survey. This aspect of the scheme would essentially be assessed at Reserved Matters stage (for Layout), however, the principle of the scheme being put forward is in some ways reliant upon the potential for benefits and improvements to the streets surrounding the proposal site, which is a missed opportunity.

(ii)(c) Decommissioned Car Parks

Parking is proposed to be removed from the existing MSCP within the red line of the application, as well as spaces within the MEMO car park, the access road, and the SWEB car park. The latter two are outside of the red line boundary of the application, and there is therefore no ability to ensure the control of the removal of these spaces through a condition.

(ii)(d) Car Park Use

No additional staff parking should be being provided. The Hospital's long term strategy has always been on the basis that there will be a reduction in trips to and from the hospital precinct by staff and patients, due to the relocation of services to more local health centres in the north and the south of Bristol. The various developments permitted throughout the Hospital Development which removed parking throughout the site have been approved with this in mind.

Whilst there would be around 34 disabled bays, the drawings are indicative only as Layout will be for a Reserved Matters application. There is limited detail in the application on how the application would bring about new benefits to vulnerable patients, it says that an electric shuttle could be explored, but there is no commitment to this, or other measures, and it is officers' view that this is an issue of principle, and should not be left to reserved matters.

There is insufficient information about the proposed split of spaces and the management of the car park which would include, but not be limited to details such as the means of operation of access, the split of parking provision between visitors, patients and staff, restrictions on use by the public. The parking policy for the Hospital has not been indicated, and charging information has not been provided, which is an essential part of parking management.

(ii)(e) Bus Hub

The bus hub is indicated and contained within the red line. Swept paths have not been provided, nor details of any waiting facilities (shelters, / raised kerb etc.), crossing points, visibility for turning and visibility around the corner or Montague Hill South. The proposed stop is within the visibility splay for the car park. The turning takes place within 15m of the egress of the car park. The

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proposal is not considered satisfactory or safe.

(iii) Travel Plan

The Council has a Travel Planning guidance document, which provides information on the preparation of a Travel Plan. The Updated Travel Plan submitted with the application refers to a Travel Plan that was made in 2013, although the original document has not been submitted. The submitted update does not contain the detail that would normally be required by the Council's template and guidance.

The update offers less commitment to the existing Green Travel Plan secured by the previous developments on the site. It is vague and does not make any commitments. There are no budgets identified and no measures, targets or incentives outlined. No additional transport facilities have been proposed other than additional cycle parking facilities. It states that achieving a reduction in car trips may be considered impractical given the varying levels of mobility of patients and visitors, however, according to the Hospital's survey only 32% travel by car for medical reasons. There is no commitment to any increase in alternative facilities other than an increase in cycle parking and potential diversion of the HUB bus to a less accessible area for passengers to disembark.

The applicant counters that the Travel Plan Update is robust, and that it provides an acceptable level of detail, however, for the reasons outlined below, it is not considered that the travel plan goes far enough minimise car trips.

(iii)(a) Staff

From recent surveys of staff, 24% were car trips made alone, 7% as passengers, and the remaining 61% by other modes of transport. According to the surveys, an increase in use by public transport, and a small increase in walking and cycling has been seen since the 2013 travel plan surveys were undertaken.

Whilst the decrease in vehicle trips is welcomed, it is unlikely that the Travel Plan has been instrumental in achieving this reduction. It is more likely to have been influenced by the implementation of the residents parking schemes in St Pauls and Southville in 2014/15. The additional cycle parking provision has been identified as already needed to address a shortfall, with surveys showing 900 members of staff cycling to the site, and fewer than 900 spaces, even with the additional cycle parking provision, available for users.

(iii)(b) Visitors / Patients

No figures have been put forward about the numbers of patients and visitors arriving by car to the site, but according to the Travel Plan, 57% of trips are made by car, 43% by other modes. A qualitative target has been set for the travel plan, which is the majority of vehicular trips made to the site, because the applicants suggest that patients vary by mobility: "This Travel Plan will target to provide information to visitors and patients over the lifespan of the Travel Plan, to encourage regular trips to be undertaken by walking, cycling and by public transport through effective user based journey planning."

However, according to the Transport Assessment, 32% who do drive do so for medical reasons. This would indicate that of those 57% arriving by car, there are 68% who don't have medical conditions requiring them to use a car. This would indicate capacity for a reduction in trips by car by patients and staff.

The original Green Travel Plan (2013 update) outlines staff parking policy, which should be reflected in any future Travel Plan. Charging for staff car parking should also be brought more in

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line with local car park charges.

(v) Benefits to Hospital Users

It is not disputed that the scheme would bring about benefits to users of the hospital, and comments describing the need for additional parking have been given careful consideration. As explored above, there are flaws in the applicant's Travel Plan and junction modelling which lead to unrealistic picture of the size of the car park needed as well as the capacity of the road network to accommodate a proposal of this scale.

(vi) Spire Hospital comparison

Noting the applicant's comparison to the Spire Hospital application (BCC ref: 17/00799/F - described in the history section above), in transport grounds, the following are pertinent differences between applications.

- Spire: not within City Centre, with less public transport accessibility than the BRI site
- Spire: net increase in 81 parking spaces (an increase of 29%)
- BRI car park: net increase in 628 spaces (an increase of 94% across the whole site)
- Spire: There are limited opportunities to park elsewhere off-street
- BRI car park: 1200 spaces within off street car parks within 5 minutes' walk to the Hospital
- Spire: committed to a robust Framework Travel Plan and parking management plan for staff
- BRI car park: Travel plan not currently considered adequate to effectively reduce traffic, and no parking management regime included
- Spire: provided full justification for the need of the additional parking, which included reducing the impact of parking congestion on the highway network.
- BRI car park: inadequate justification of need

To conclude the transport consideration, the introduction of an 820 space car park would substantially worsen existing levels of congestion by creating delays to traffic flow throughout the entire city centre and along the M32.

Congestion along the M32, Newfoundland Way, Bond Street and St James Barton roundabout are a major concern on every day of the week throughout the day. The application fails to adequately demonstrate that the impact on the surrounding highway network will not be severe with regard to safe and effective flow of the network. Furthermore, it is not appropriate to increase the size of the car park without demonstrably effective mitigation measures to offset the impacts on safety and congestion, which have not been provided.

The proposal is therefore contrary to the NPPF, BCS10, DM27, BCAP29, BCAP30, BCAP 34 and BCAP43.

(D) AIR QUALITY

Section 15 of the NPPF states that Planning policies and decisions should sustain and contribute towards compliance with relevant limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and Clean Air Zones, and the cumulative impacts from individual sites in local areas. Opportunities to improve air quality or mitigate impacts should be identified, such as through traffic and travel management, and green infrastructure

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provision and enhancement. Planning decisions should ensure that any new development in Air Quality Management Areas and Clean Air Zones is consistent with the local air quality action plan.

Core Strategy policy BCS23 States that development should be sited and designed in such a way as to avoid adversely impacting upon environmental amenity by way of fumes, dust, noise, or any form of air pollution.

Site Allocations and Development Management policies - policy DM33 states that development which has the potential for an unacceptable impact on environmental amenity by way of pollution, but is considered desirable for reasons of economic or wider social need will be expected to provide an appropriate form of mitigation. For development in Air Quality Management Areas, mitigation should take the form of on-site measures, or where appropriate, a financial contribution to off-site measures. The policy also states that development in designated Air Quality Management Areas should take account of existing air pollution and include measures to mitigate its impact on future occupiers where possible and consistent with other policies of the development plan, such as those on climate change and urban design.

The Air Quality Assessment (AQA) submitted with the application uses a modelling approach to predict the significance of the impacts of development on air quality, and this has been assessed by the Council's Air Quality manager who raised objections which are discussed below.

The applicant was provided with the opportunity to respond to initial objections, and in response submitted a rebuttal in the form of a revised Air Quality Assessment which is available on the Council's website. The initial concerns remain in place, as the substantive conclusions of the document remain the same - which is that the development would result in 'moderate' (rather than 'negligible') air quality impacts - meaning that air quality in the area would be worsened.

The increase in pollutant levels is reported as being an over-estimation, however the report provides no evidence for this. The applicant claims that no new trips will be generated by the development, but as set out in the Transport Key Issue, officers disagree. Hence the increase in pollutant levels cannot be regarded as an over-estimation.

Secondly, the AQA does not demonstrate that an acceptable degree of mitigation could be provided. The development will lead to an unacceptable impact on existing concentrations of NO₂ at sensitive receptors. The maximum impact is shown as 1.91 ug m⁻³ (microgrammes per metre cubed), which was at the R8 receptor point (which is at IQ Students to the east of the site). The theoretical scenario in Appendix B shows an even higher impact so it is possible that the range of impact could be as high as "substantial" if this scenario is realised.

This actively works against the Council's legal obligation to reduce concentrations of NO₂ to below the legal maximum in the shortest time possible. Under direction from the Secretary of State, officers are developing a plan to do this, and this development will work against the plan, and as a result fall foul of the requirement in the NPPF, which states that new development shall be consistent with the local air quality action plan.

Furthermore, this corridor (Park Row Marlborough Street) is particularly problematic in terms of concentrations due to its topography which traps pollutants, coupled with existing high levels of traffic congestion. This means, that even with measures such as a Clean Air Zone, it would be very difficult for the Council to control nitrogen dioxide (NO₂) concentrations to below 40ug m⁻³. The 40ug m⁻³ limit is as described within the air quality regulations - and the prior UK Air Quality Strategy. The Council is directed by the government to publish a plan to reduce concentrations to this level in the shortest time possible.

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Officers have also reviewed the scheme's reported impact on dust particulates (PM10 PM2.5), and these are predicted to be of negligible significance, though it is regrettable that any increase is predicted as the Council is also trying to bring concentrations of these pollutants down, not up. In terms of construction impacts, these should be managed as described, by a construction management plan which would be secured by a condition in the event of an approval.

On a wider point, it is of concern that the hospital continues to place so much reliance on catering for journeys by the private car. Emissions from private cars directly impact the health of all citizens and disproportionately affect vulnerable populations.

Some mitigation is suggested within the AQA, however this is focussed only on the construction phase and is not regarded as suitable mitigation for the effect of the car park itself on air quality, and it would not affect the moderate impact predicted.

The development would therefore work against the aims of the Council's developing Clean Air Plan by introducing a moderate impact on air quality in relation to annual mean concentrations of NO2 and the associated air quality objective. It would worsen air quality in an area proven to have already high concentrations of pollutants, with no commensurate mitigation, and would prevent the Council from fulfilling its legal obligations of reducing nitrogen dioxide to below the legal maximum in the shortest time possible.

(E) AMENITY

Good design and protection and enhancement of the environment are critical components of central government guidance, as identified in the NPPF. Adopted Bristol Core Strategy Policy BCS21 expects development to safeguard the amenity of existing developments and create a high-quality environment for future occupiers. Furthermore, Policy DM27 states that proposals should not prejudice the existing and future development potential of adjoining sites or the potential for the area to achieve a coherent, interconnected and integrated built form.

The nearest residential properties to the application site are at Montague Court and Dighton Court, off Montague Hill South and opposite the application site to the north-east. There are also residences at Hamilton Court and Blenheim Court to the south as well as slightly further up the hill from the site, properties on Marlborough Hill Place to the north-west. There is a play area to the north-west of the site known as Dove Street play area, the enjoyment of this space would also be affected.

The main amenity impacts that would be felt would arise from transport and air quality, and these aspects have already been discussed above. In view of the large volumes of traffic that would be experienced in the local area, the proposal would fail to safeguard the amenity of nearby residents, including users of the play area to the immediate north west of the site.

The application does not explore the impact of the development in terms of a potential loss of daylight or sunlight for nearby occupiers. In Marlborough Street South, there are habitable rooms facing onto the application site. The Planning Statement says that the building would not be the tallest building in the local area, given its position to other existing tall structures and that it will not give rise to any significant adverse impacts on local residents due to overshadowing or loss of light.

This is not considered to be an adequate assessment of the issue, and no BRE Sunlight and Daylight Assessment has been submitted that would enable this conclusion to be quantified. Officers have used the proposed section drawings to carry out a BRE 25° test in respect of properties on Marlborough Hill South and it is likely that the 8 storey car park would result in a loss

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of light from the residential buildings identified, which would result in a harmful loss of amenity, and this shall form a reason for refusal.

Whilst the Layout details are reserved, the application would incorporate improvements to public realm on Montague Steps and other areas surrounding the site, therefore there is potential for the scheme to bring about amenity benefits in this regard. In the event of an approval, a high quality hard and soft landscaping scheme would be an expectation.

(F) SUSTAINABILITY

As embedded in the NPPF, sustainability should be integral to all new development, and should encourage opportunities for development to draw its energy supply from decentralised, renewable or low carbon energy supply systems. BCS13 requires development to mitigate climate change by encouraging walking, cycling and the use of public transport instead of journeys by private car and by incorporating other measures to mitigate and adapt to climate. BCS14 sets out a heat hierarchy for new development, and an expectation that new development will connect to existing CHP/CCHP distribution networks. The same policy also expects development to provide sufficient renewable energy generation to reduce carbon dioxide emissions from residual energy use in the buildings by at least 20%. BCS15 requires developments to demonstrate through a Sustainability Statement how they have addressed energy efficiency; waste and recycling; conserving water; materials; facilitating future refurbishment and enhancement of biodiversity. This policy also expects non-residential development to score a BREEAM 'Excellent' rating.

The above policies seek to ensure that developments respond to climate change in their physical characteristics, however there is a discussion embedded in this report, on the principle of whether this development would be sustainable in itself, being that it is for a car park that would encourage car trips into the city centre.

The application is accompanied by a Sustainability Statement. This sets out that there is no BREEAM certification method that is appropriate for a car park, and therefore the scheme has not been assessed for BREEAM. It states that the development would actively promote sustainable travel, particularly for commuting purposes, through the provision of high quality secure facilities for cyclists. It would also include provision for electric vehicle charging which would mitigate emissions from cars. The document states that the building has been designed so that the more habitable spaces (ancillary office, changing rooms and WCs) have been located away from the south facing elevation to reduce solar gain. It would be constructed with a steel frame to enable easier recycling of materials at the end of the structure's life. The Council's Flood team has commented that a Sustainable Urban Drainage System (SUDS) would need to be incorporated at detailed design stage, and this would be assessed at Layout stage under Reserved Matters, secured by condition in the event of an approval. In order to mitigate the impact of the development, the supporting documents suggest that the car park could incorporate green walls or living roofs as well as a landscaping scheme.

The Energy Statement sets out the building's energy needs and how savings in residual carbon emissions using renewable energy would be achieved against the Part L baseline. This document sets out that the building would have an unregulated energy demand as a result of the demand for electric vehicle charging, notwithstanding also the fact that more accurate energy demands would be known at detailed design stage. The document sets out that the building would be made ready for District Heat connection (to either the Trust operated system or the eventual Council-wide system). This would be secured via s106 in the event of an approval. To reduce the building's energy demands by 20% required by policy, Air Source Heat Pumps and Photovoltaic panels are identified as appropriate forms of renewable technology. In the event of an approval, the applicant

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would be required to incorporate these technologies with further details of the calculations provided at Reserved Matters stage.

To apply the above policies, the sustainability officer made the comments included earlier in this report which are based on the how the scheme could be developed further through the design process in response to sustainability policies.

To an extent, the sustainability merits of this scheme lie within the principle of development itself. These are discussed in other key issues of this report, mainly Transport (Key Issue C) with the Travel Plan being a critical driver on determining the actual need for the car park, and its size. If a car park is to be accepted on this site, officers would need to be assured that all other possible options had been explored by the Trust, through findings of the travel plan and transport modelling, and that adequate mitigation was being proposed for its negative impacts. As explored above, this has not been carried out to the satisfaction of officers, therefore the development is not justified, and would not be a sustainable development.

(G) DESIGN AND CONSERVATION

The NPPF requires that developments:

- a) will function well and add to the overall quality of the area, not just for the short term but over the lifetime of the development;
- b) are visually attractive as a result of good architecture, layout and appropriate and effective landscaping;
- c) are sympathetic to local character and history, including the surrounding built environment and landscape setting, while not preventing or discouraging appropriate innovation or change (such as increased densities);
- d) establish or maintain a strong sense of place, using the arrangement of streets, spaces, building types and materials to create attractive, welcoming and distinctive places to live, work and visit;
- e) optimise the potential of the site to accommodate and sustain an appropriate amount and mix of development (including green and other public space) and support local facilities and transport networks; and
- f) create places that are safe, inclusive and accessible and which promote health and well-being, with a high standard of amenity for existing and future users; and where crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion and resilience.

Requiring good design is also at the heart of Bristol planning policy, and BCS21 expects a high quality design in all developments, which contributes positively to an area's character and identity, creating or reinforcing local distinctiveness.

DM29 requires all new buildings to (amongst other things) be clearly organised in terms of their form and internal layout and circulation to reflect the hierarchy of function they will accommodate, the uses they will serve and the context they will address; and allow for future adaptation or extension to accommodate alternative uses. The same policy requires buildings to respond to the changing future needs or circumstances of occupiers and to incorporate exteriors and elevations that provide visual interest from a range of viewing distances with a high quality detail of an appropriate scale and proportion.

Whilst the application is in Outline format, for Scale and Access only, certain design matters fall to be assessed within this application and give rise to concern as set out below. There is no indication that these concerns could be overcome in the detailed design phases.

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(i) Harm to Heritage Assets

Section 66 of the Planning (Listed Buildings and Conservation Areas) Act 1990 states that in considering whether to grant planning permission for development which affects a listed building or its setting, the local planning authority shall have special regard to the desirability of preserving the building or its setting or any features of special architectural or historic interest which it possesses. The Authority is also required (under Section 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990) to pay special attention to the desirability of preserving or enhancing the character or appearance of the conservation area. The case of *R (Forge Field Society) v Sevenoaks DC* [2014] EWHC 1895 (Admin) ("Forge Field") has made it clear where there is harm to a listed building or a conservation area the decision maker "must give that harm considerable importance and weight." [48]. This is applicable here because there is harm to the setting of the conservation area caused by the proposals as set out below.

Section 16 of the national guidance within the National Planning Policy Framework (NPPF) 2019 states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation, with any harm or loss requiring clear and convincing justification.

Paragraph 193 of the NPPF states that when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation (and the more important the asset, the greater the weight shall be).

Further, paragraph 194 states that any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), should require clear and convincing justification. It states that substantial harm or loss of grade II listed buildings or grade II registered parks or gardens should be exceptional, and assets of the highest significance should be wholly exceptional.

Paragraph 195 states that where a proposed development would lead to substantial harm to (or total loss of significance of) a designated heritage asset, LPAs should refuse consent unless it is demonstrated that the harm is necessary to achieve substantial public benefits that outweigh the harm or loss.

Paragraph 196 states that where a proposed development will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

Finally, paragraph 197 says that the effect of an application on the significance of a non-designated heritage asset should be taken into account when determining the application. In weighing applications that directly or indirectly affect non-designated heritage assets, a balanced judgement will be required having regard to the scale of any harm or loss and the significance of the heritage asset.

In addition, the adopted Bristol Core Strategy 2011 within Policy BCS22 and the SADMP policy DM31 seek to ensure that development proposals safeguard or enhance heritage assets in the city.

Officers have undertaken the assessment required under the Sections 66 and 72 of the Planning (Listed Buildings and Conservation Areas) Act 1990 and have given special regard to the desirability of preserving the assets, their setting and features of special architectural or historic interest which they possess. They have given this harm considerable importance and weight.

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In accordance with s66 and 72, considerable importance and weight has been given to the harm caused to the nearby listed buildings and the setting of the Kingsdown and Stokes Croft Conservation Areas.

Montague Court, Montague Hill South (2 Dighton Street) is Grade II Listed. This building has 3 storeys, an attic and basement, and is a mid-Georgian townhouse. The Heritage Statement submitted with the application describes it as having high heritage significance, but that the setting makes a negligible, positive contribution to the building's overall significance in view of the later, large-scale development around it. The proposed transport hub is considered by the Heritage Statement to have an overall slight negative impact on the setting and significance of this listed building, with the removal of the existing car park seen as having a positive impact.

Officers consider that by intruding above the roofline of the listed building, the introduction of an eight storey structure as backdrop would pose harm to the setting of this asset. Negative impact would also result from development on the setting of grade II Listed assets on Kings Square when viewed from the east side and from Dove Lane; here the height of development will likely result in a significant intrusion over the roofscape of the west side of the square. This is poorly demonstrated in the Visual Impact Assessment and inadequately addressed in the Heritage Impact Assessment.

The impact on the Kingsdown Conservation Area has not been adequately assessed particularly in terms of the impact on views from Marlborough Hill Place and Marlborough Hill where the proposed development is likely to have a significant and harmful impact. A key part of the character of the Kingsdown Conservation Area is how it is influenced by local topography and geology, giving rise to skyline views of the city. Similarly, the views from, and overall character of the Stokes Croft conservation area would also be harmed. These views out of the conservation area would be interrupted by the scale of the proposed development which would result in less than substantial harm to its setting which would not be outweighed by any proportionate benefit. It is not considered that the proposal would harm the setting of the St James Parade conservation area, due to the presence of tall buildings between the application site and this conservation area, as well as the Marlborough Street thoroughfare, both of which provide a degree of separation.

The Eugene Street flats are the earliest examples Bristol Corporation's planned slum clearance development in the city, and were built between 1925 and 1933. The submitted Heritage Statement accompanying this scheme notes the blocks as "of negligible heritage significance and as such, are not considered to be of sufficient evidential, historical, aesthetic or communal value to be considered non-designated heritage assets." Since the application was submitted, the Eugene Street flats have been included on the Local List and fall to be regarded as non-designated Heritage Assets. The flats have a strong character and lend an attractive air to the locality. They represent a major landmark in the housing of the poor in the city centre and are of strong aesthetic and historic interest.

The NPPF requires the LPA to apply a balanced judgement having regard to the scale of any harm or loss and the significance of the heritage asset in such incidences, and in this case, in view of the historic value that the properties have within the townscape, it is considered that substantial harm would be brought about by their loss, with no proportionate public benefit offered by the scheme. Consequently the proposed demolition of these flats would have a negative impact on the character of the area, in addition to the harm that would be inflicted on the setting of the listed building and conservation area, and is contrary to the NPPF, and Local Plan policies BCS22; DM26 and DM31.

(ii) Loss of trees

The proposal would result in a loss of green space and trees on site. The proposed green roof would to some extent help offset some of ecological impact of the proposal, but the amenity value

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given by existing trees on the site would be lost. This aspect is discussed in more detail at Key Issue (H).

(iii) Townscape Views

The submitted Views Analysis show that the proposed building would appear unduly prominent in key townscape views, and overplay what would essentially be a car park, as a prominent building.

The scale of the proposed building set within this topography is likely to cast significant shadows in the area. The bulk of this impact will be on areas of public realm, making them cold, damp and unattractive. As an example, the feature public space is primarily north facing and is likely to be shade for most of the day. This will have a negative impact on the quality of the spaces and public realm. No shadow analysis has been submitted to verify this.

(iv) Pedestrian Movement

A transport hub would anchor vehicles, cyclists and pedestrian movement, but the movement would be transitory in nature and without meaningful dwell time. Therefore despite anchoring movement, the proposal is unlikely to facilitate quality streets and spaces for people to enjoy. A clear understanding of impact of the proposed development on pedestrian/cycle movement, focusing on the quality of experience, has not been provided. A genuinely design lead approach to design of the public realm is needed to improve and not further disadvantage users of pedestrian, cycle and public transport experience of the urban environment.

(v) Public Art

The proposal does not incorporate any provision for public art and no commitment has been made about its incorporation at reserved matters stage.

Although the design of the building and the public realm is a reserved matter, the proposal does not provide a convincing response to demonstrate that it would effectively mitigate the negative effects of introducing a car park onto the site. The harm to the heritage assets that would be brought about, would not be outweighed by any public benefit.

(H) LOSS OF TREES

Policy BCS9 states that individual green assets should be retained wherever possible, and that development should incorporate new or enhanced green infrastructure of an appropriate type, standard and size.

Policy DM17 seeks to protect Important Open Spaces, Unidentified Open Spaces, Urban Landscape and Trees and recognises the role these features have in providing landscape and visual amenity quality.

Policy BCAP25 expects development to incorporate as many street trees or other trees as possible.

The application is accompanied by a Tree Survey which assesses the condition of trees on and surrounding the site. There are 13 trees within the site within category B (moderate quality with 20+ years remaining contribution), and 5 within category C (Low quality with minimum 10+ years contribution).

Whilst it is clear that at least 10-12 Category B trees would have to be removed in order to deliver the car park, at this stage, the application does not commit to removing or retaining specific trees elsewhere on the site, some being indicatively shown on the site layout plan. The Bristol Tree

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Replacement Strategy has not been applied, and the application does not offer a commensurate replacement tree plan or financial contribution.

Because of the unmitigated loss of trees, the lack of proposed tree replacement shall form a reason for refusal, however, in the event of an approval, (or an appeal) the applicant would be asked to apply the BTRS calculation to provide replacement trees on the site, or to agree to a monetary contribution to mitigate for the loss of trees.

CONCLUSION

The application would bring about benefits to users of the BRI Hospital which are described in the application, and it is recognised that there is much support for the scheme. Unfortunately the basis on which the application is made is unfounded. The application is not supported by robust supporting documents which justify the proposal in transport terms, and there is no mechanism offered by which to secure the removal of nearby car parks.

The applicant's own Air Quality Assessment reports an increase in pollutants, which would go against the Council's commitment to improving air quality in the City Centre, with no mitigation proposed.

The demolition of the Eugene Street flats would result in a loss of viable family sized accommodation in a sustainable location and the proposal as a whole would pose an unwelcome addition in the street scene, leading to harm to amenity of nearby residents, an unmitigated loss of trees as well as harm to heritage assets.

The application is recommended for refusal.

COMMUNITY INFRASTRUCTURE LEVY

This is an outline application. The CIL regulations require that CIL liabilities are calculated when reserved matters applications are submitted as until the reserved matters stage it is not necessarily clear as to the exact level of CIL liable floor space.

RECOMMENDED REFUSE

The following reason(s) for refusal are associated with this decision:

Reason(s)

1. The application proposes excessive and unjustified levels of parking within the City Centre, and puts forward no mechanism by which to secure the closure of car parks outside the site. It fails to adequately demonstrate that the impact on the surrounding highway network will not be severe with regard to safe and effective movement within the highway network for all users. Furthermore, the proposals fail to demonstrate safe and adequate access onto local highway network. The proposal would therefore be an unsustainable development, and would give rise to congestion and resultant unacceptable impacts on highway safety, and a loss of amenity, without commensurate mitigation. It is therefore contrary to NPPF, BCS10, BCS11, BCS13, BCS21, DM27, BCAP29, BCAP30, BCAP34 and BCAP43.

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2. The proposal would worsen air quality in an area proven to have already high concentrations of pollutants, with no commensurate mitigation. This in turn would prevent the Council from fulfilling its legal obligations of reducing nitrogen dioxide to below the legal maximum in the shortest time possible, and would fail to safeguard the amenity and wellbeing of nearby occupiers and other users of the area. The development is therefore contrary to the NPPF, Core Strategy policy BCS21, BCS23, and SADMP policy DM33.
3. The proposed loss of 36 family sized houses in a sustainable city centre location is unjustified, and with no satisfactory benefit being proposed as mitigation for the loss, is contrary to the NPPF and Core Strategy policy BCS5.
4. The proposal would result in substantial harm through total loss of a series of three Locally Listed buildings as non-designated heritage assets, and harm to the setting of the Grade II Listed Building at 2 Dighton Street and harm to the Kingsdown conservation area. The degree of harm would not be outweighed by any proportionate public benefit. The building would appear unduly prominent in key townscape views, which, at the scale proposed would be unable to be mitigated through detailed design work. The proposal is therefore contrary to the Planning (Listed Buildings and Conservation Areas) Act 1990, the NPPF, policies BCS21, BCS22, DM26, DM27, DM28, DM30 and DM31.
5. The proposal would result in the removal of a number of trees, which offer amenity value to the streetscene, and this loss is not mitigated by a tree replacement plan using the Bristol Tree Replacement Strategy. The application therefore fails to mitigate for the loss of existing green infrastructure, contrary to the NPPF, BCS9 of the Core Strategy 2011, DM17 of Site Allocations and Development Management Policies 2014 and BCAP25 of the Bristol Central Area Plan 2015.
6. The application fails to demonstrate through proper assessment that there would be no loss of Daylight or Sunlight to nearby residential properties (particularly those on Marlborough Hill South), therefore it is likely that a loss of amenity would be inflicted in this regard. The application is therefore contrary to the NPPF, BCS21 of the Core Strategy and DM27 of SADMP.

Advice(s)

1. Refused Applications Deposited Plans/Documents

The plans that were formally considered as part of the above application are as follows:-

171030-FATKIN-XX-XX-DR-AX-30120 P3 Proposed levels 02 and 03, received 15 October 2018

171030-FATKIN-XX-XX-DR-AX-30120 P4 Proposed level 0, received 15 October 2018

171030-FATKIN-XX-XX-DR-AX-30130 P3 Proposed levels 04 and 05, received 15 October 2018

171030-FATKIN-XX-XX-DR-AX-30140 P3 Proposed levels 06 and 07, received 15 October 2018

171030-FATKIN-XX-XX-DR-AX-30140 P3 Proposed Roof Level, received 15 October 2018

171030-FATKIN-XX-XX-DR-AX-30501 P2 Existing and proposed SW elevation, received 15 October 2018

171030-FATKIN-XX-XX-DR-AX-30502 P2 Existing and proposed SE elevation, received 15 October 2018

171030-FATKIN-XX-XX-DR-AX-30503 P2 Existing and proposed NW elevation, received 15 October 2018

171030-FATKIN-XX-XX-DR-AX-30504 P2 Existing and proposed NE Elevation, received 15

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October 2018

171030-FATKIN-XX-XX-DR-AX-30601 P2 Existing and proposed section 1, received 15 October 2018

171030-FATKIN-XX-XX-DR-AX-30602 P2 Existing and proposed section 2, received 15 October 2018

171030-FATKIN-XX-XX-DR-AX-30603 P2 Existing and proposed section 3, received 15 October 2018

171030-FATKIN-XX-XX-DR-AX-31701 P2 Proposed typical indicative cladding detail A, received 15 October 2018

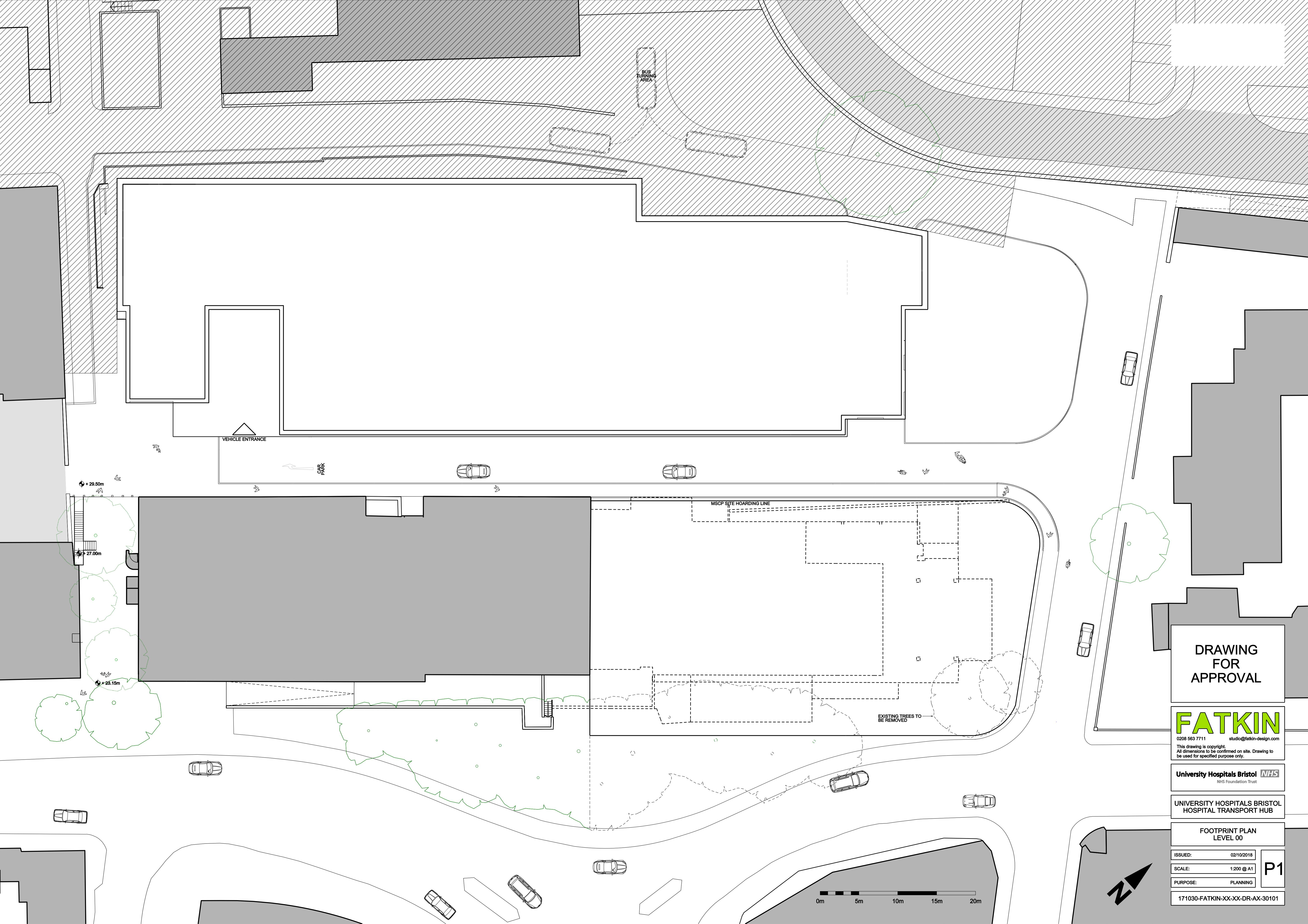
171030-FATKIN-XX-XX-DR-AX-90100 P1 Site location plan, received 15 October 2018

171030-FATKIN-XX-XX-DR-AX-30100 P4 Proposed Level 00, received 15 October 2018

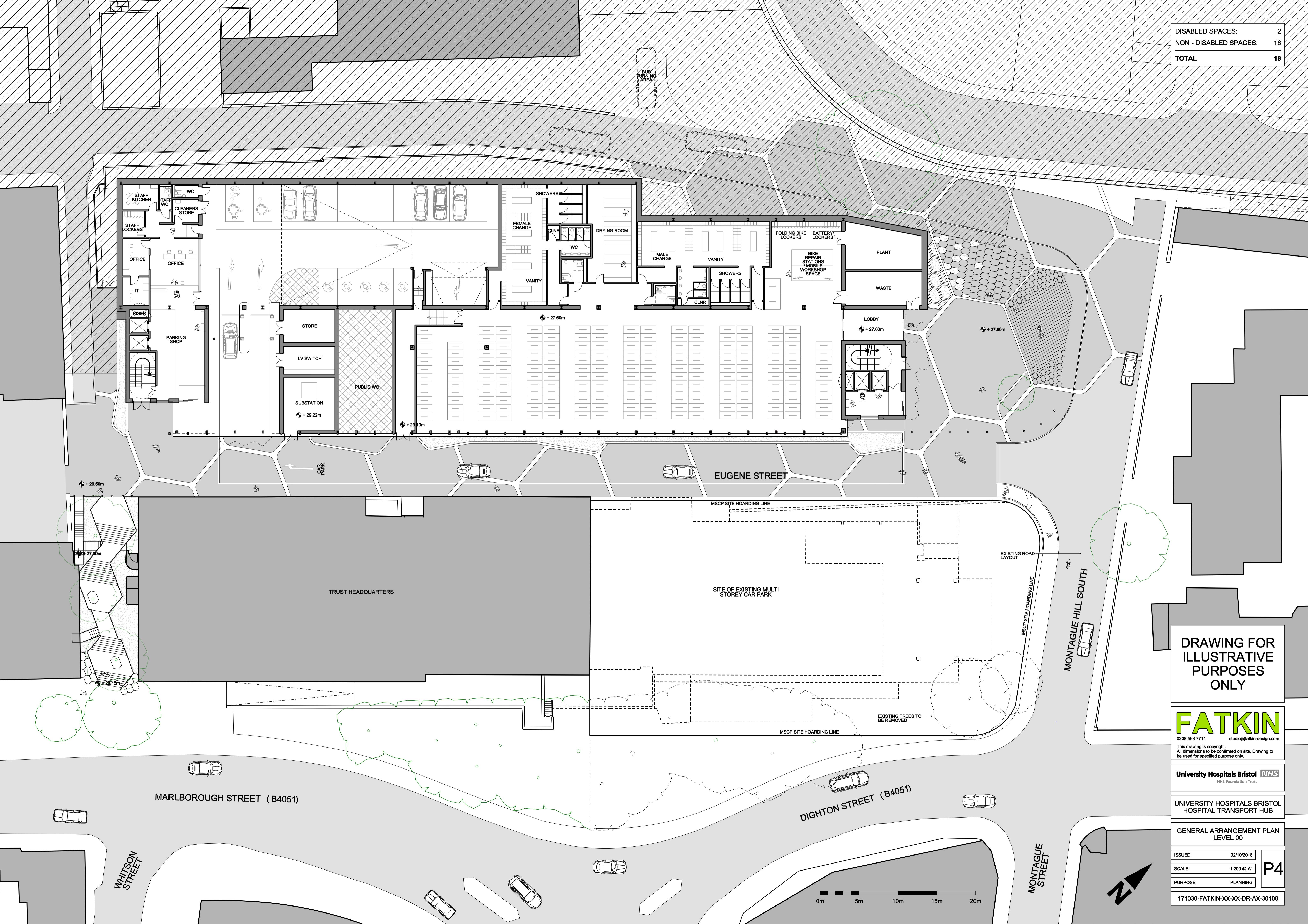
Supporting Documents

1. Trust Headquarters, Marlborough Street

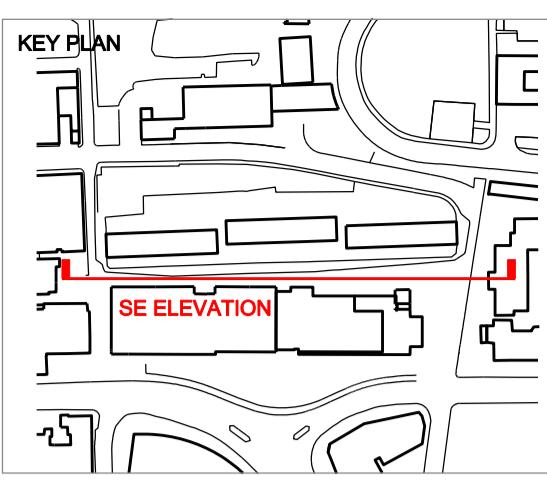
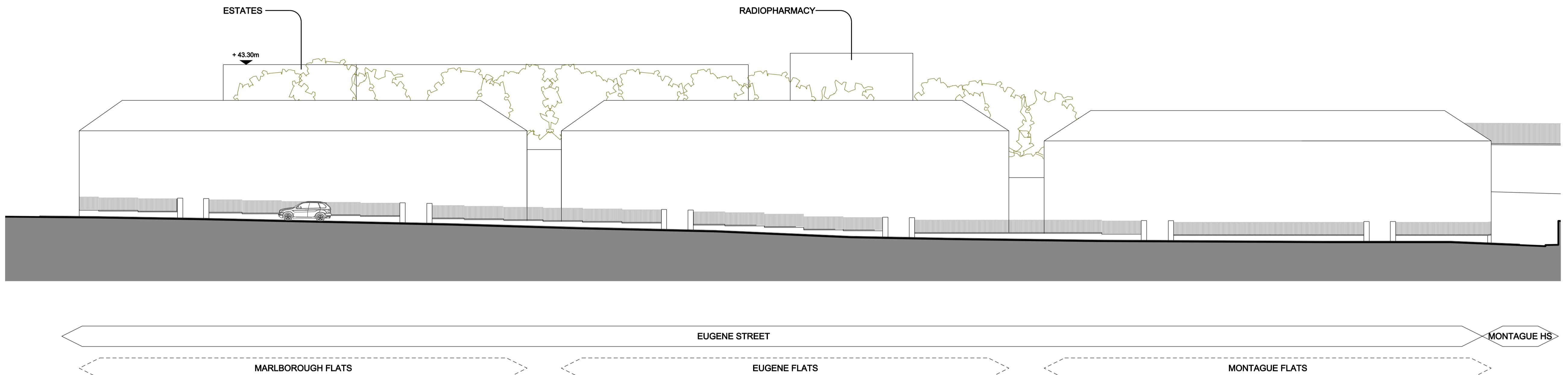
1. Footprint plan level 00
2. Illustrative general arrangement plan level 00
3. Illustrative South East elevation
4. Illustrative South West elevation
5. Map showing current UHB on-site car park
6. Map showing patient and visitor car parks
7. Visualisations



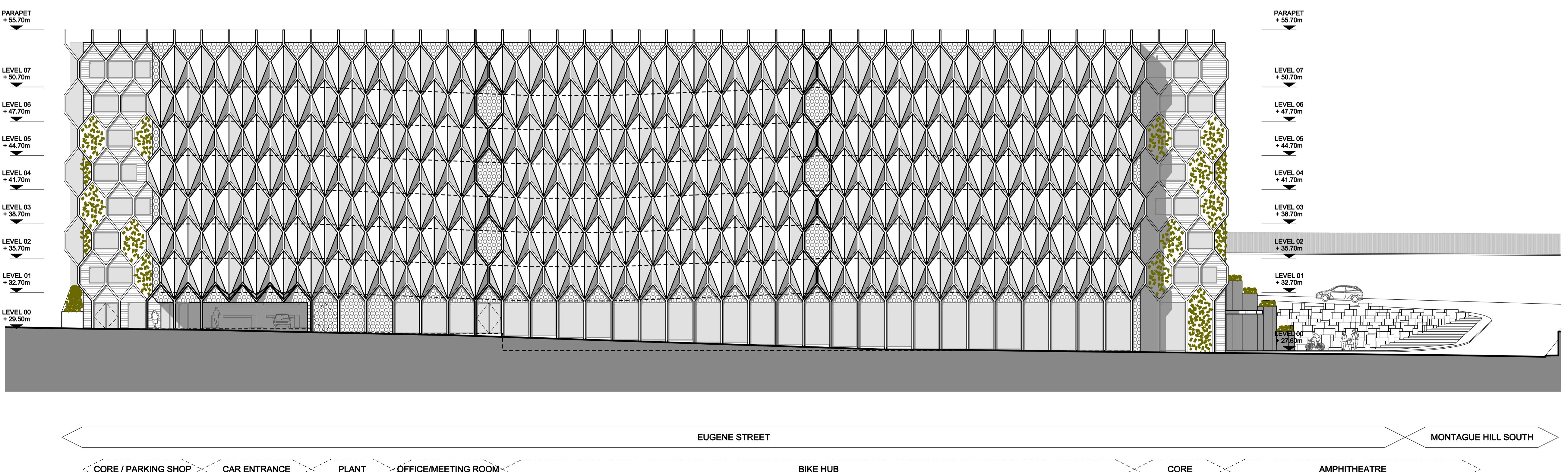
DISABLED SPACES:	2
NON - DISABLED SPACES:	16
TOTAL	18



EXISTING



PROPOSED



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University Hospitals Bristol NHS
Foundation Trust

UNIVERSITY HOSPITALS BRISTOL
HOSPITAL TRANSPORT HUB

SOUTH EAST
GENERAL ARRANGEMENT
ELEVATION

ISSUED: 02/10/2018

SCALE: 1:200 @ A1

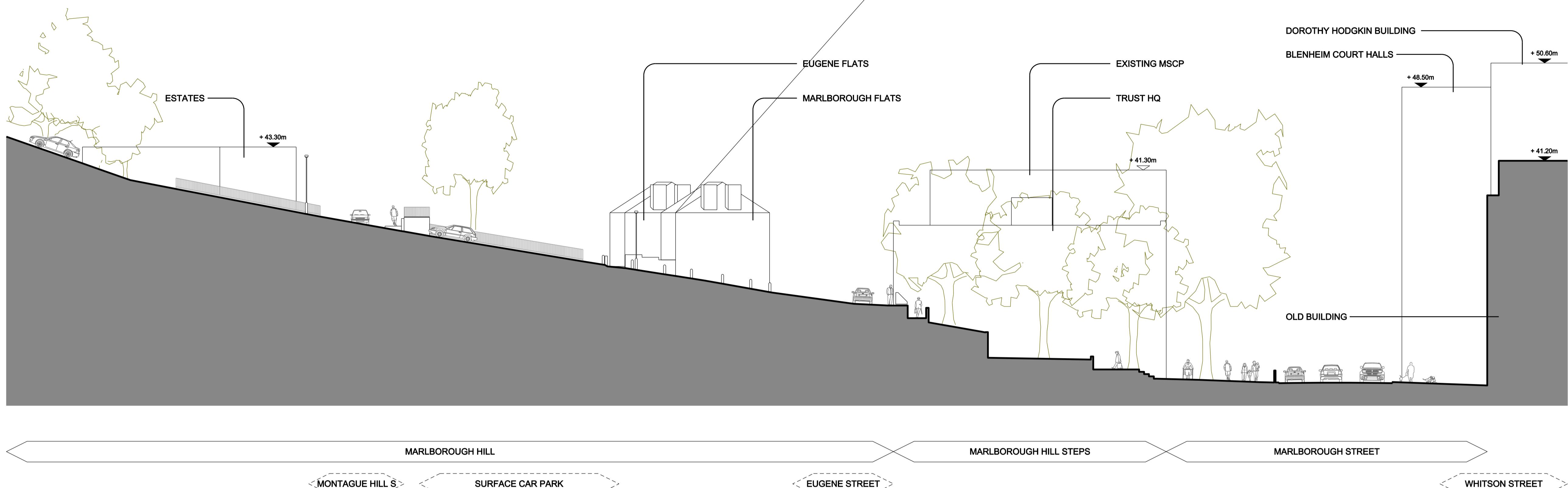
PURPOSE: PLANNING

P2

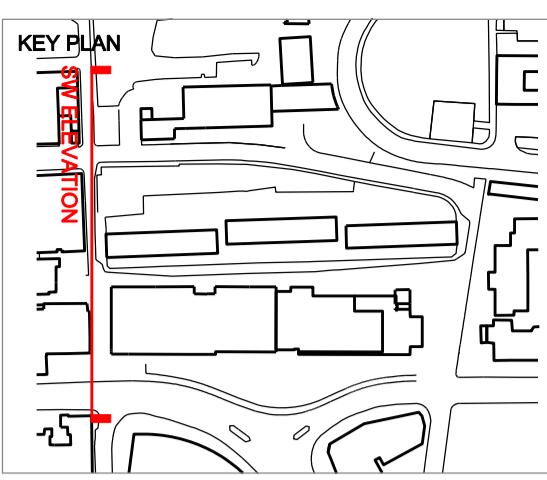
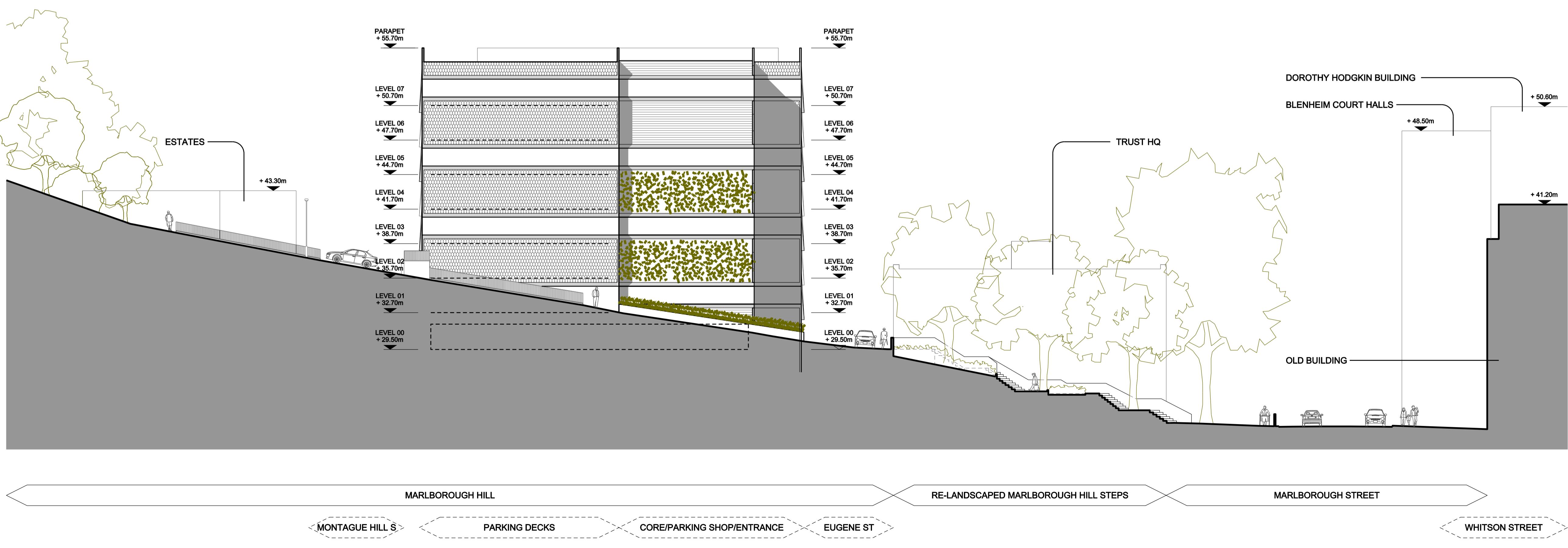
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171030-FATKIN-XX-XX-DR-AX-30502

EXISTING



PROPOSED



4.3 Car Parking

Table 4a – Map showing current UH Bristol Staff on-site car parks (including disabled bays)

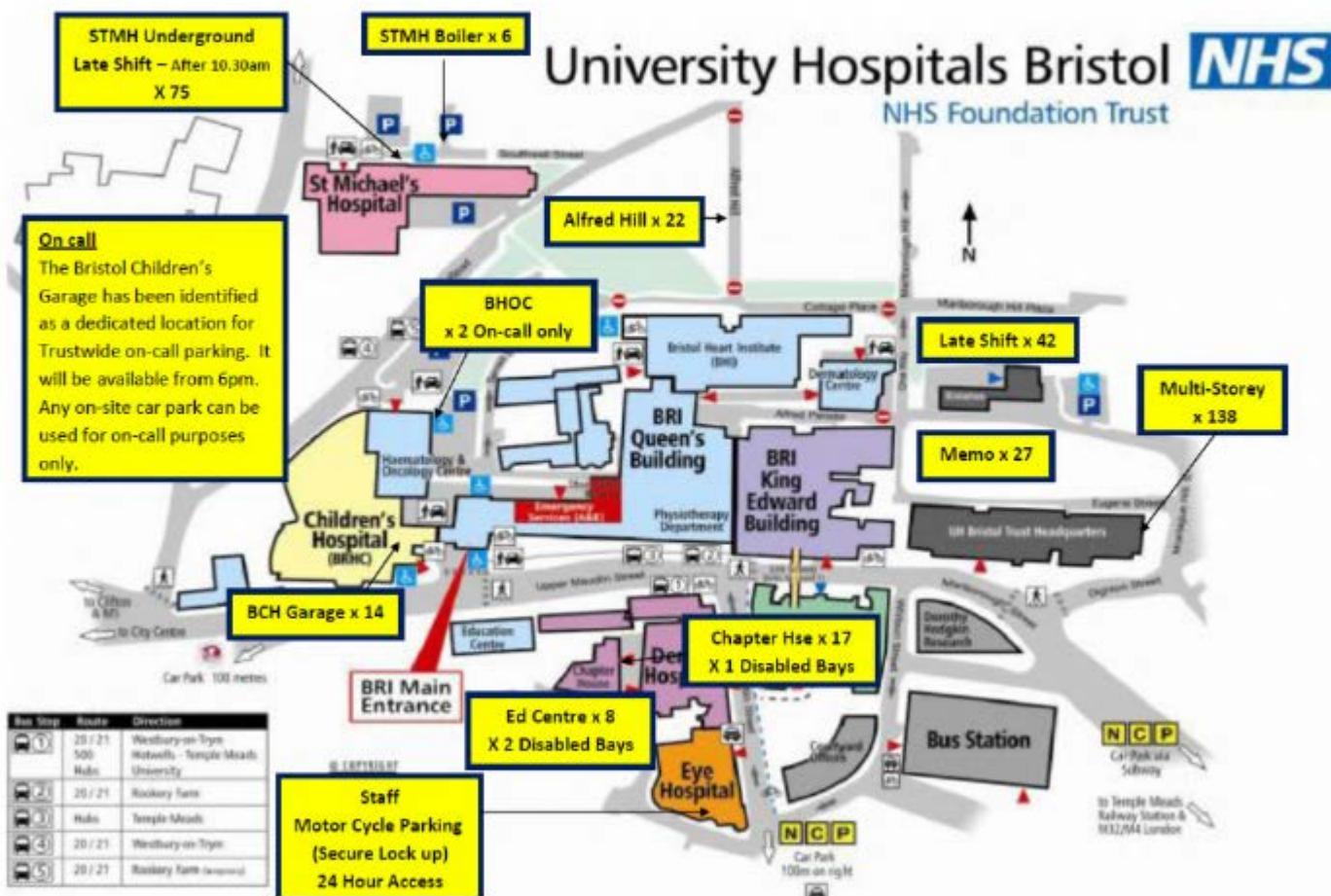


Table 4b – Map showing current UHBristol Patient & Visitors car parks (including disabled bays)

