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Objection to Section 62A Planning Application: S62A/2025/0101 7 Belvedere Road

Change of use from three residential flats (use class C3) to a 12 bedroom extension to an existing nursing home (use class C2), including demolition and replacement of rear extension and external alterations.

I am making this representation on behalf of Westbury Park Community Association. The Association, established in 2011, seeks to safeguard and enhance the physical environment and character of Westbury Park - an area which includes Belvedere Road.

The Community Association objects to the proposal to extend the care home at 8 and 9 Belvedere Road to 7 Belvedere Road on the following grounds:-

The proposed development is contrary to policies BCS10 of the Council's Core Strategy and Development Management policy DM23 as it would further increase demand for parking spaces on roads already full to parking capacity, creating even greater hazards for all road users.

The proposed development would add to the constant disruption and disturbance already suffered by local residents by virtue of having three care home businesses in Belvedere Road, notably service vehicles and ambulances blocking the road in the absence of available roadside parking spaces.

1 Preamble

1.1 Having twice been refused planning permission by Bristol City Council and twice having a planning appeal dismissed by the Planning Inspectorate for almost identical proposals we had rather hoped that the applicant would accept these decisions rather than pursuing a fourth attempt to secure a planning approval. This new application differs from previous applications in only minor respects. It would lead to more indiscriminate parking and threats to road safety – grounds on which previous applications were refused. We therefore believe that the current application should be refused on the same grounds.

1.2 In trying to sustain a case for the extension the applicant still clings, against all the evidence to the contrary, to the argument that there are sufficient on street parking spaces available to meet the additional parking requirements resulting from the proposed nursing home extension.

1.3 The proposed extension may only have a marginal effect on the number of staff requiring spaces but the extension would mean more servicing/delivery vans, more ambulances and more car-borne visits by health workers, relatives and friends. This would mean (i) Belvedere Road being blocked even more often as commercial vehicles and ambulances are forced to stop in the middle of the road and (ii) even more drivers cruising up and down narrow local roads in search of a space.

2 Staff and Visitor Numbers

2.1 In the Traffic Movement and Highways section of the applicant's supporting Planning Statement it is claimed that the 12 bedroom extension will be staffed by existing care home staff and that no increase in staff numbers is proposed. As the existing 40 bedrooms requires a total of 34 full time equivalent members of staff it is hard to believe that a 30% increase in the number of beds will not require any further staff. A previous application (application 22/01529/F) for a 12 bedroom extension indicated that there would be an increase in staffing levels – 2 further staff between 8.00 and 14.00 and one further staff member between 14.00 and 20.00. It was also conceded in this application that two car spaces would be needed at change-over times for a short period.

2.2 The claim that the majority of staff travel to and home by walking, cycling and public transport and do not require a parking space is hard to believe. The nearest bus stop offering frequent bus services is some distance from Belvedere Road across the open space of the Downs and cycling or walking any distance home would be quite a challenge for someone who has just completed an eight hour shift. Many staff may not have cars but it is more than likely that staff use taxis or depend on securing lifts from family members and friends, particularly at night.

2.3 With regard to visitors it is accepted in the Planning Statement that the majority of visitors travel by private car – not surprising as many relatives and friends travel from distance. It is claimed that care home visitors are so few that they do not have an unacceptable impact on road safety and are currently being adequately accommodated on street. This may be true at some times, less so at most times. Any increase in visitor numbers will add parking pressure.

2.4 It is claimed in the Planning Statement (the section on Car Parking) that the increase in visitor parking requirements will be offset by the residents of the three flats no longer requiring spaces. It is hard to understand why Bristol City Council's car parking requirements for new dwellings is used to arrive at an offset parking figure from the existing flats. Why did the applicant not simply indicate the number of cars owned by the current occupiers of the flats and then apply the consequent decrease in demand for on street parking spaces once the flat dwellers move out?

3 Servicing/Delivery Vehicles and Ambulances.

3.1 Servicing/delivery vehicles and ambulances present a major road safety challenge. Very rarely are there two free spaces available together anywhere near 7 Belvedere Road to allow larger vehicles and ambulances to park on the side of the road (there were no such instances on the day the transport consultants conducted their parking survey). This means that vehicles either obstruct traffic by parking in the middle of the road for up to ten minutes at a time (a figure stated in the Planning Statement), park across driveways or try to manoeuvre into tight spaces that risk damage to other vehicles.

3.2 The Planning Statement (the section on Traffic Movements and Highway Impact) suggests that "the low frequency of deliveries is not considered to have an unacceptable impact on road safety and is adequately accommodated on street". We strongly disagree.

3.2 The applicant also claims that "there will be no increase in the frequency of servicing/delivery trips as a consequence of the proposed extension and no increased impact on highway safety, capacity or current parking". We believe that a 30% expansion of the care home is certain to lead to more ambulance visits and inevitably lead over time to an increase in the number of servicing/delivery vehicles.

3.3 In the submitted Service Management Plan the applicant claims that an in-house co-ordinator will restrict times for servicing/delivery vehicles but it is hard to see how this would make much difference – in the absence of available parking spaces the vehicles will still block the road whatever traffic management system is in place.

4 Parking

4.1 The Planning Statement submitted to support the application maintains that there are sufficient off-street car spaces available to meet the additional demand for spaces generated by the proposed extension. This claim is supported by a yet another parking stress survey (Technical Note – On Street Car Parking Stress Survey). As with the previous parking survey commissioned by the applicant (conducted by transport consultants Entran in October 2020 to support application 22/01529/F) the parking survey merely serves to demonstrate that very few spaces are available at

most times of the day and night, particularly in Belvedere Road and The Glen – a situation which is experienced daily by local residents and visitors.

4.2 Paragraph 3 of the Technical note claims that the on-street parking stress surveys were carried out in accordance with the methodology set out in Bristol City Council's Parking Survey Methodology document. However, in a number of instances this is not the case:-

(i) The Quadrant and much of Blenheim Road and Clay Pit Road are included in the survey but are not within a 150 metres walking distance of 7 Belvedere Road.

(ii) Bristol City Council's methodology excludes streets which could be perceived to be unsafe or uncomfortable such as dark streets with poor surveillance. Clay Pit Road which runs across part of the Downs extensive open space is poorly lit and distant from houses and therefore night time free spaces in this road should not have been counted as being available.

4.3 Appendix 3 comprises 152 photographs purporting to show "free" parking spaces at different survey times so as to prove that off street parking spaces are always available. The photographs serve to prove the opposite as they show roads almost entirely parked up during the day and at night.

4.4 Approximately 50 of the spaces shown in the 152 photos purporting to show free spaces are outside the 150 metre limit. Including all these as valid spaces suggests that the parking survey consultants did everything they could to inflate the parking availability figures in the knowledge that free spaces are at a premium. As the photographs are used to support the parking capacity figures presented in column six of the parking surveys the figures are highly suspect.

4.5 Notwithstanding the major reservations we have about the accuracy of the parking survey almost all the results presented show particularly high stress rates in Belvedere Road and The Glen at all survey times, even reaching 100% in some instances. Rather than demonstrating the availability of on-street spaces even these suspect figures serve to demonstrate that the parking in Belvedere Road and adjacent roads is a major problem for local residents, for nursing home staff and visitors and for ambulances and servicing/delivery vehicles trying to access the care home.

4.6 Local residents and Westbury Park Community Association have also carried out parking surveys when faced with the various planning applications relating to 7 Belvedere Road. These have also shown local roads to be at almost maximum capacity during the day and at night.

4.7 The status of occasional parking surveys, the difficult parking situation and the consequent impact on road safety was well summed up by the Planning Inspector in paragraph 7 of his appeal decision letter dated 10th March 2021 relating to a previous application (Application Number 19/03104/F)

"The parking surveys are only a snapshot in time and do not necessarily represent the situation at all times. Nonetheless it is clear to me that the parking is at a premium. As I saw several times on my site visit, the parking situation results in vehicles often having to park in the middle road. This causes congestion and conflict which is exacerbated by two way working and creates a hazard for all road users".

5 Previous Decisions on Appeal

5.1 In the March 2001 decision letter the Inspector stated *"I therefore conclude that the proposal as submitted would harm highway safety. Policies BCS10, DM2 and DM23 of the Bristol Local Plan Site Allocations and Development Management Policies (LP) require safe streets integrated with the development, the regulation of parking impacts from shared housing and the avoidance of unacceptable traffic conditions. Paragraph 110 of the National Planning Policy Framework (The Framework) highlights the needs for deliveries and emergency vehicles and safety of streets for all*

users. Paragraph 109 of the Framework states that development should only be prevented if there would be an unacceptable impact on highway safety, or the residual cumulative impacts would be severe. The proposal would be in conflict with these policies”

5.1 In a second decision letter dated 30th January 2023 relating to a subsequent application (22/01529/F) the Inspector made a similar assessment:-

“Therefore, for the reasons given above, the proposal would result in additional demand for parking, exacerbating the existing problems. This would risk further vehicles blocking footways and dropped kerbs, causing some pedestrians, particularly those with buggies or in wheelchairs, to use the carriageway itself. This would result in conflict with moving vehicles and risk the highway safety of road users. The additional demand would also result in further congestion and blockage of driveways, causing greater inconvenience and conflict for residents.

I therefore conclude that the proposal would have a harmful effect on highway safety and congestion, having regard to on-street parking availability in the locality. I attach significant weight to this harm. As such, for the reasons given above, the proposal would be contrary to policies DM2 and DM23 of the Bristol Local Plan Site Allocations and Development Management Policies (SADM), adopted July 2014, and policy BCS10 of the Bristol Development Framework Core Strategy, adopted June 2011 (the Core Strategy).”

5.3 As the current application is almost identical to the two applications dismissed on appeal on strong highway safety grounds we believe that it must also be refused on highway safety grounds.

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