I am writing to object to application reference S62A/2025/0101 relating to the extension of Glenview Nursing Home in Belvedere Road from 40 to 52 beds.

The applicant has raised applications for this extension several times before, which have been refused. I am asking that this new application is again rejected on the grounds that:

A. The proposed development would result in an unacceptable increase in demand for parking, leading to inappropriate on-street parking activities, safety concerns and the obstruction of access to private driveways. This would be contrary to Policy BCS10 (Transport and Access Improvements), Policy DM2 (Residential Sub-divisions, Shared and Specialist Housing) and Policy DM23 (Transport Development Management).

The application has been re-submitted, despite previous refusals, due to the applicant's contention "that there has been a significant change in material considerations since 2023 (updated highways evidence and new NPPF) to warrant reconsideration of these proposals".

This document (section A) fully evidences that there has in fact been **no change in material considerations relating to the highways evidence,** and that the reason for previous refusals is still entirely valid. In particular, I provide evidence that:

- The applicant's parking surveys significantly over-state the parking availability, due to:
 - Being measured over a range of 230m instead of 150m as required by BCC
 - Not actually counting the spaces available
- When corrected, the surveys only evidence an average of 1.38 spaces per survey (with no spaces at all evidenced in 7 of the surveys)
- The parking stresses reported for the last 6 years demonstrably still exist (evidenced by 4 new surveys of my own, with supporting photographs showing every car parked)
- The parking demands will necessarily increase if the application is approved, increasing the existing road safety issues.

I am also asking PINS to reject it on the following two additional grounds, with further information provided in this document:

- B. The proposed development would increase the concentration of nursing homes to occupy 6 out of 11 buildings on one side of Belvedere Road, increasing the harmful conditions which already exist due to related traffic, road blockages for deliveries and ambulances, noise etc.
- C. The proposed development would remove housing which is much needed for young couples and families, in an ideal area close to schools, nurseries and shops, and result in a harmful concentration of residential care homes in one small road, reducing the choice of homes in the area (leading to 106 nursing home beds compared to an estimated population of 69 in standard accommodation).

The following sections provide full supporting evidence for each of the above reasons for refusal.

All sources are cross-referenced in the end-notes at the end of this document.

Reason A: Road safety concerns due to increase in demand for parking.

Parking in the roads surrounding the site is already severely stressed. There are multiple sources of evidence substantiating this, including the findings of the last similar application considered by PINS (APP/Z0116/W/22/3299847). The applicant claims that this situation has changed – however, this is categorically not true; the surveys he provides are severely flawed and misleading and, as evidenced in this document, **do not** support his claims that there are multiple spaces available.

The application would result in a **30% increase** in residents¹ in the home. Despite the applicant's claims to the contrary, this would result in increased traffic to the site for a number of reasons, as explained in this section. This increase in traffic and parking demand, in an area already suffering from parking stress, will increase safety concerns arising from obstructive and dangerous parking.

1. Lack of Parking Capacity

The parking – and resultant road safety – issues in these roads are significant and well known. A primary reason is that these roads provide the first unrestricted and free parking adjacent to the large Residents Parking Zone areas extending down to the City Centre, and are therefore used as a free car park for city commuters, who park here to then take the bus, or cycle/walk, to their place of work. The roads are also used for parking by teachers at the nearby schools, as well as parents during school drop-off/pick-up (often leaving their cars in between). The staff and visitors of the existing 94 care home beds also use the roads for parking.

1.1. Evidence of parking issues continuously since 2019

The parking stresses have been documented many times by Bristol City Council (BCC) and the Planning Inspectorate (PINS) over recent years:

- On 9th August 2023, BCC rejected application 22/01221/F for St Christophers (entrance c150m from the site of this application), stating "The area immediately surrounding the application site suffers from parking stress, particularly given the location on the edge of Bristol Residential Parking Scheme."
- On 30th January 2023, PINS rejected application APP/Z0116/W/22/3299847 for 7 Belvedere Road, stating "evidence of parking stress on Belvedere Road including vehicles parked obstructively across driveways and dropped kerbs. Residents have undertaken further surveys which also show little parking availability locally. Although my visit and the surveys are only snapshots in time, there is no dispute that on-street parking in the area is at a premium with a high level of demand."
- On 9th June 2021, BCC rejected application 20/06030/F for 7 Belvedere Road, stating "It is recommended the application is refused on the basis that the proposed development would generate further demand for on-street parking in an area which is already oversubscribed and would subsequently result in harm to highway safety."
- On 27th May 2020 BCC rejected application 19/03104/F for Belvedere Road, stating that "The proposed development would result in an unacceptable increase in demand for parking, leading to inappropriate on-street parking activities, highway safety concerns and potentially the obstruction of access to private driveways. This would be contrary to Policy DM23."

¹ NB the applicant incorrectly claims it is a 23% increase. Evidently, 12 additional beds on top of the current 40 is an increase of 30%.

- On 10th March 2021 PINS upheld the above decision "APP/Z0116/W/20/3263935", stating "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."
- On 1st May 2019 BCC rejected a resident's planning application for The Glen (within 100m of this site), where they referred to these roads as "an area where there is already over demand for parking spaces" and stated that a net reduction of just one parking space "would increase the risk of motorists parking in a dangerous manner".

Finally, 3.2.4 of the applicant's own Travel Planⁱ states (in relation to Belvedere Road): "Existing demand for on-street car parking is high." and 3.2.6 states "Demand for on-street car parking in The Glen is also high."

Contradicting this, the applicant claims that the situation has suddenly improved. This is not the case, as evidenced in section 1.2 below. Ultimately, there is no reason why the parking stresses documented for the last 6 years would suddenly have diminished.

1.2. Evidence refuting the applicant's surveys suggesting that the situation has improved

The applicant has provided a number of parking surveys suggesting that parking availability has improved. Unfortunately, these are deeply flawed. Once adjusted for the major errors documented below, they only indicate an average of 1.38 spaces per survey, including 7 surveys where there is no evidence of any spaces at all.

The two major errors are:

Applicant's Surveys measured over range of 230m instead of 150m

BCC methodology requires that parking surveys count number of spaces available within a 150m walk of the site, specifically "NOT a circle with a 150m radius but a 150m walking distance as measured along all roads up to a point 150m from the siteⁱⁱ." The applicant's surveys were conducted over distances of up to 230m walk from the site.

This is evidenced by the maps provided in "Technical Note On Street Parking Stress Surveys Appendix 2", which include a Scale Bar showing a 50m distance, making clear the actual extent of the survey. I have included as Attachment 1 an annotated copy of one of these maps, showing the correct range of 150m from the site, according to this Scale.

Survey does not count actual number of available spaces

The BCC methodology shows that the applicant needs to count the "number of available parking spaces". However, **the applicant has not done this** – he has only calculated the difference between a theoretical maximum capacity of the road and the number of cars parked at a given time.

Specifically, the BCC methodology (included in "Technical Note On-Street Car Parking Stress Surveys Appendix 1") requires a table showing:

| Street Name | Total length of kerb space | Number of cars parked | Number of available |
|-------------|----------------------------|-----------------------|---------------------|
| | (metres) | | parking spaces |

However the applicants' tables (Technical Note Tables 2 – 39) only show the following:

| | Street Name | Capacity [A] | Number of cars parked [B] | Total parking capacity [C=A-B] |
|---|-------------|--------------|---------------------------|--------------------------------|
| , | where: | | | |

- "Capacity" has been calculated as "Total length of kerb space / 5m" (as shown in his Technical Note Table 1)
- "Total parking capacity" [C] has been calculated as "Capacity [A] minus Number of cars parked [B]"

This is not the same thing as the number of parking spaces actually available.

Instead of counting actual spaces, the applicant has calculated a theoretical maximum number of cars which could be parked in the road, if:

- All vehicles are short enough to be parked in 5m
- All vehicles are parked regularly with minimum space in between them
- All curbside remains free for parking (ie there are no skips or coned-off sections).

and then calculated the difference between this and the number of parked cars.

However, clearly, whenever these conditions are not **all** met, there will be fewer vehicles parked than his assumed maximum capacity, without necessarily leaving any spaces large enough for a new car to be parked.

In reality, the roads often contain MPVs which measure up to 5.25m longⁱⁱⁱ, and transit vans (lengths ranging from 5.53m to 6.7m^{iv}) (including the applicant's own vans). Additionally, it is impossible to ensure that vehicles are always parked as tightly as possible – there are frequently spaces left between cars which are too short to park a car, but which reduce the maximum capacity of the roads. And there are frequently skips which further reduce parking availability.

As comparison, when marked-off parking bays are created, BCC's Policy (taken from "Bristol Transport Development Management Guide/ 3.5.3 Car parking"^v, dated October 2022), states "On standard residential streets, parallel parking bays shall be minimum 2m wide by 6m long for each car, or 5.5m long in the case of end bays".

If this rule was used to create parking bays on Belvedere Road and The Glen, it would create 78 bays instead of the applicant's suggested 91. In almost all of the applicant's surveys, there are more than 78 cars parked in these two roads!

From this, it should be clear that a difference between the number of cars parked and a hypothetical maximum that could be parked in ideal conditions **does not indicate actual spaces available for parking.**

While it is obvious that the applicant should count actual available spaces rather than deducing them based on a theoretical maximum capacity, the following table (updated version of Table 1 in his document "Technical Note On Street Car Parking Stress Surveys Text") shows a realistic capacity of each of the roads, using the correct range of 150m and the above BCC guidelines for parking bays². This reduces the likely capacity within range from 179 to 93 spaces:

 $^{^2}$ Calculated using a conservative assumption that half the spaces will be "end bays" – 5.5m – and the other half will be 6m

| Street | Total Length (m) of kerb space | Applicant's Stated Parking Capacity | Realistic Parking Capacity within 150m | Amended due to: |
|--------------------|-----------------------------------|--|---|-------------------------------|
| Clay Pit Road | 95 | 19 | 3 | Corrected range |
| Blenheim Road | 245 | 49 | 9 | Corrected range |
| The Quadrant | 80 | 16 | 0 | Corrected range |
| The Glen | 220 | 44 | 38 | BCC guidance for parking bays |
| Belvedere Road | 235 | 47 | 40 | BCC guidance for parking bays |
| Westbury Park Road | 20 | 4 | 3 | BCC guidance for parking bays |
| | TOTAL | 179 | 93 | |

This makes it clear that the applicant's calculations, to deduct (instead of count) the number of available spaces, are severely flawed and effectively meaningless.

Lack of evidence of available spaces

Given the fact that the applicant has not counted actual spaces, it is not surprising that he does not indicate the locations of the full number of spaces he has calculated as available. Instead, he only provides 4 "sample" photos for each survey, and indicates the location of these spaces.

Attachment 2 provides a full analysis of the photos which he has submitted in his "Technical Note on Parking Stress Surveys, Appendix 3". This shows that, out of 152 photos:

- 72 (nearly 50%) are in locations which are outside the 150m range
- 18 show spaces which are too small in which to park a car
- 5 show "spaces" which would block driveways or a disabled parking space
- Only 57 photos show genuine unrestricted spaces within the required range.

This equates to an average of 1.38 valid spaces per survey. In 7 surveys, there were no valid spaces available.

The applicant has had many months in which to conduct these surveys and to select the dates which provide the strongest support for his case. If there really were the large number of valid spaces available, within 150m of the site, that he claims, surely he would have been able to count them, and provide photographs of all of them to support his case.

The fact that he cannot do this demonstrates that parking stresses are as severe as they were last time PINS considered his application.

1.3. Evidence demonstrating continuing high demand for parking spaces

As noted above, nothing has changed in the roads since previous applications were submitted. My own objections to previous applications contained literally hundreds of photographs showing the lack of available spaces in these roads. In responding to PINS for the most recent one (APP/Z0116/W/22/3299847) I submitted full photographic evidence of 5 surveys conducted in Oct/Nov 2022 in which there were no available parking spaces in range.

However, to confirm that this remains the situation, I am providing further evidence with this objection.

Photographic surveys taken in May 2025

Clearly we have had limited time and resources to conduct extensive parking surveys, given only four weeks between learning of this application and the deadline, one of which is half-term (which is ruled out by the BCC methodology).

I have however, managed to conduct 4 surveys, each fully evidenced by photographs showing **all cars (and gaps between them) in the entire range**. The number of spaces available are shown in the table below:

| Date | 7 th May 25 | 12 th May 25 | 16 th May 25 | 20 th May 25 |
|------------------------------------|------------------------|-------------------------|-------------------------|-------------------------|
| Time | 08:39 – 08:55 | 08:03-08:16 | 07:54 – 08:11 | 08:20-08:44 |
| Total spaces available within 150m | 1 | 1 | 0 | 0 |

Full data and photographs are included in Attachment 3 (with jpegs available on request).

Evidence of illegally/unsafely parked cars

The lack of available parking spaces frequently leads to illegal/unsafe parking in these roads, particularly with:

- Cars parked across dropped kerbs or corners of roads
- Cars blocking driveways
- Cars blocking disabled spaces

These are evidenced by the high number of Penalty Charge Notices issued, as shown in the table below. (Data provided by BCC in FOI Reference 58982836.)

| Road | 2022 | 2023 | 2024 |
|----------------|------|------|------|
| Belvedere Road | 59 | 66 | 54 |
| The Glen | 6 | 5 | 2 |
| Blenheim Road | 14 | 3 | 8 |
| Clay Pit Road | 24 | 8 | 18 |

For comparison, the number of PCNs issued in Royal Albert Road (the road immediately parallel to Belvedere Road, of a similar length and residential nature) was 2 in each of 2022 and 2023 and zero in 2024. (Data provided by BCC in FOI Reference 59136632.) This supports that the parking situation in the 4 roads around the site is already significantly worse than other roads in the area.

Finally, during the limited time available for this application, I have logged and photographed cases of observed obstructive parking and included these as Attachment 4 (jpegs available on request). Although I have only been able to do this on days when I have been walking down Belvedere Road, not every day, there are 128 photographs taken on 20 days; an average of more than 6 obstructively parked cars every day.

It can be assumed that most people only park illegally when there are no valid spaces available, demonstrating the lack of available parking in these roads.

2. Increased Demand for Parking arising from Application

The applicant suggests that the extension of his care-home from 40 to 52 beds will only result in negligible additional parking demand. The applicant justifies this by amending the information he provided in earlier applications, which did show increased parking demand, to produce reduced figures which are neither verifiable nor enforceable.

It is clear that additional parking demands will arise from the following:

2.1. Additional Staff

The applicant claims that

"the 12-bedroom extension will be staffed by the existing care home, and no increase in staff numbers is required/proposed to provide for the additional 12 residents (staff/resident ratios are determined by an industry-standard dependency tool, in accordance with CQC standards). Therefore, there will be no additional staff-related traffic movements/parking activities associated with the proposed extension and no increased impact on highway safety, capacity or current parking^{vi}."

This statement is simply not plausible, not verifiable and not enforceable. Please would you consider the following:

- There may not be significant increases in staff required for activities such as administration and cooking, but the number of care staff cannot fail to increase, as more care hours will need to be provided.
- As the applicant notes, staff/resident ratios in nursing homes are determined by a needsdependency tool. The required process is described as "by adding up the numbers of daily care hours required for each resident, the total number of daily care hours required in your service can be calculated^{vii}."
- It is self-evident that an increase of 30% of residents will result in a roughly corresponding increase of daily care hours which are to be provided by the applicant. This has to be provided by extra staff (rather than extended hours) as the nature of care is that there are peak times for demand (for example first thing in the morning).
- In fact, industry guidance suggests that typical ratio of carers/residents range from 1:3/1:4 for nursing care to 1:5/1:6 for other residential dementia care^{viii}. Glenview is licenced to provide nursing care for dementia residents^{ix}, so it can be assumed that an additional 12 residents would require between 3 – 4 additional staff.
- Even the applicant's previous applications acknowledged some increase in staff, as shown below:
 - Application 22/01529/F to provide a 12-bed extension (the same as this one) stated the need for 2 additional staff between 08.00 and 14.00 and 1 additional staff at all other times^x.
 - Application 20/06030/F to provide a 14-bed extension stated the need for 3 additional staff^{xi}.
 - Application 19/03104/F to provide a 17-bed extension stated the need for 3 additional staff^{xii}.
- There is no explicable reason why the need for care staff would have reduced since these earlier applications.

The above all indicate that in practice **there will be 3 – 4 additional care staff required for the extension.**

While the applicant may hope that these staff will not drive, this cannot be enforced. In fact, the applicant's travel surveys are puzzling, as they do not reconcile with the observations of local residents, who frequently see care staff arriving by car, looking for parking spaces on the streets. The nature of care work is that carers work anti-social hours, and do not get paid for travel time, which typically leads to the use of cars rather than public transport.

2.2. Additional Visitors

The applicant confirms that "the majority of visitors travel by private car" and suggests that there will be "two additional daily visitor trips by car"xiii.

However, Bristol Transport Development Policy 23, Appendix 2^{xiv} states that for Nursing Homes one visitor parking space should be allowed per 3 bed spaces. This is clearly indicative of the likely number of visitors expected to drive to the nursing home.

The applicant's figures do not include professionals such as GPs, community health workers, fund assessors, providers of additional services (hair/nails etc), most of whom tend to use cars due to the need to travel quickly between appointments. The number of all such types of visitors is directly dependent on the number of beds, so will increase accordingly.

It is therefore not unreasonable to expect additional parking needs of at least 4 spaces.

2.3. Summary of additional parking requirements

The applicant's case is based on an unrealistic minimum increase in staff and visitors travelling to the site by car. However, the data in this section suggests that **the actual impact could be an additional 7 - 8 cars**. Even allowing for a reduction of an estimated 3 cars for the existing flats, this would still result in a net increase, which is supported by the TRICS data.

The applicant's estimates are ultimately unenforceable, and there is nothing to stop the applicant claiming now that staff levels will not increase, and subsequently recruiting as many additional staff as he needs to meet the needs of the extended nursing home. If this development goes ahead and the actual numbers of staff/visitors are in fact greater than suggested, the increased demand will further exacerbate the existing parking issues. Given the known parking stresses in these roads (as evidenced in section 1 above), I sincerely ask that a decision will be made on the basis of realistic estimates rather than overly-optimistic ones.

3. Road safety issues due to increased parking stresses

Residents of the surrounding roads to the site are concerned that the issues related to parking demand exceeding available spaces are causing severe road safety risks, in roads within less than 0.5 km of Westbury Park school and two nurseries, which are frequently used by families with small children. These risks can only be exacerbated by the increase in demand due to extending the nursing home by 30%.

There are daily occurrences of obstructive parking (eg right up to the road junctions, on corners, and blocking dropped kerbs for pedestrian crossings), caused by the lack of available spaces. This degree of obstructive parking forms a very real hazard to road users and pedestrians. This is evidenced in Attachment 4.

Furthermore, Belvedere Road is frequently blocked by delivery vans and ambulances (see Section B below). This results in other road users reversing back on to Westbury Park (road) and The Glen, where visibility is frequently obscured by the corner parking, presenting a hazard to other road users.

It should also be noted that when spaces do arise, they are rarely unoccupied for long – this is evidenced by the applicant's own survey maps (Technical Note On Street Parking Stress Surveys Appendix 2), as spaces at peak times are typically filled by the time of the next survey 15 minutes later. Traffic and safety issues are caused by drivers circling round (often stressed and angry) trying to find the rare space to park – this will be exacerbated by the additional staff and visitors of the nursing home.

In April 2022 a Westbury Park neighbourhood group commissioned Mindset Research^{xv}, an independent market research company, to undertake a survey of local residents and parents of children attending Westbury Park School, and ask for their views about road safety, particularly in the roads close to the school.

The full survey results are provided in Attachment 7. In summary, of the 298 respondents:

- 63% believe the roads in this area to be very unsafe or fairly unsafe
- 81% see parking in Westbury Park having a dangerous impact on road safety (comments referred to obstructive parking, as described in section (1c) above, and driver stress)
- 67% said they had witnessed accidents, incidents or near misses in this area (44% more than once).
- The top two issues were reported to be:

| Issue | % of respondents reporting this as | % of respondents reporting |
|---------------------------|------------------------------------|--------------------------------|
| | an issue | this as their number one issue |
| Lack of parking available | 89% | 30% |
| Children struggling to | 72% (rising to 80% of parents with | 33% |
| cross roads safely | children at Westbury Park Primary | |
| | or Daisychain nursery) | |

100% of respondents living in Belvedere Road, The Glen and Blenheim Road (the roads closest to the proposed development) reported that parking was limited (compared with 84% of the total number of respondents), supporting that these roads are seen as amongst the worst in the area for parking.

4. Conclusion

I trust that I have demonstrated in this section that:

- The demand for parking remains excessively high in the roads surrounding the site
- The applicant has not substantiated his claim that the parking situation has improved; his surveys are demonstrably flawed in a number of critical areas, and when corrected suggest an average of 1.38 spaces per survey
- My own surveys in May 2025 show only 0 or 1 space per survey
- The application will increase the number of residents of Glenview by 30%, inevitably increasing the volume of traffic and demand for parking
- There are already safety issues in these roads, which would be exacerbated by the increased demand if this application is approved.

Reason B: Worsening of existing harmful conditions

Residents have provided evidence to all the previous applications, showing the disruption to Belvedere Road caused by the existing three nursing homes. This includes:

- Frequent road and driveway blockages due to the homes' delivery vehicles, commercial waste collection vehicles, ambulances, hearses etc
- Distressing noises (day and night) from care home residents crying out.

Increasing the occupancy of Glenview by 30% will necessarily increase this impact. The number of ambulance visits will increase in direct proportion to the number of beds, and the number of deliveries, and/or or the duration of the visits, will similarly increase.

Unfortunately the application under-states the frequency and duration of the blockages.

Road blockages

The applicant suggests that delivery vehicles and ambulances can "park their vehicle in a vacant on-street parking spot^{xvi}" rather than blocking the road; this is obviously impossible in practice, due to the lack of parking spaces evidenced in section A.

In fact, this is why the applicant proposed (in his previous three applications) to introduce two servicing bays, each taking up 2 "normal" spaces^{xvii}. Given the parking stresses, he would not have done this unless he had known it to be necessary. As evidenced in Section A above, the parking situation has not changed since the last application, so the dedicated servicing bays would be as necessary now as they were then.

All delivery vehicles and ambulances are of a length to require at least two adjacent "normal" parking spaces. The applicant states that servicing vehicles are up to 7.6m in length^{xviii} – see example below of one parked across two residents' drives (20th May 2025). Whereas NHS ambulances are up to 6.9m long^{xix}, and require an additional 2.5m clearance at the rear in order to enable patients on stretchers to be safely loaded, plus manoeuvring space for parking, similarly requiring two normal spaces, examples shown below.



It's worth noting that only 15 of the applicant's 38 parking surveys evidenced a single valid space in Belvedere Road; none showed two adjacent spaces (as detailed in Attachment 2).

In the absence of curb-side parking spaces, and as shown above, the delivery vehicles and ambulances either:

- Block the road; or
- Block residents' driveways, delaying residents from accessing or leaving their houses.

The applicant suggests that "Vehicles will not be anticipated to stay longer than 10 minutes^{xx}". This is a gross under-estimate of the reality – which is that the applicant's food delivery vans typically stay for up to an hour, taking 30 minutes to deliver to each of his two homes. For example, Attachment 5 presents time-stamped photos showing the **food delivery van blocking a driveway continuously between 10.26 and 10:58 on 23**rd **May 2025, delivering to Glenview** (having parked further up the road earlier on to service the applicant's other nursing home). A 30% increase in residents is bound to lead to an increase in the duration of the visit.

The applicant acknowledges that ambulances stay between one and three hours^{xxi}.

Additionally, there are commercial waste vehicles (already at least twice a week on top of the normal BCC waste collections), hearses, and other vehicles servicing the homes.

Frequency of Visits

The applicant states that "typically, an ambulance will visit the existing care home twice per month^{xxii}". This is a vast under-statement of the number of ambulances observed by residents. Further details and photographic evidence are provided in other objections to this application (particularly from **Sector 2019** However, at a summary level, **in the fortnight 16**th – **30**th **May, residents observed at least 16 ambulances attending the Belvedere Road nursing homes.** These are detailed in Attachment 6. (Clearly, we are not able to see/log every visit, so the actual number of ambulances attending may well be more than this.)

The frequency is clearly very significantly higher than would be expected on any normal residential street, especially one which is only 150m long containing 21 buildings. This cannot be seen as reasonable.

Ambulance visits are directly related to the number of nursing home beds, so will necessarily increase with a 30% increase in residents at Glenview.

It is also surprising that the applicant suggests there can be only four food deliveries per week, when in his previous application (Appeal ref: APP/Z0116/W/22/3299847):

- Servicing Management Plan Paragraph 2 stated: "there will be around four delivery/collection vehicles per day."
- Planning Statement Paragraph 6.33 stated "there will be "2 no. additional supply deliveries a week"

Clearly the applicant's current claims are unverifiable and unenforceable, and it is impossible not to expect that the current observed frequency of road and driveway blockages will continue and increase, in line with 30% more residents at Glenview.

Impact on residents and road safety

Belvedere Road already suffers high levels of disruption and road safety issues due to the three existing nursing homes. Increasing the number of beds to 106 residents will clearly have a direct impact on frequency and duration of road/driveway blockages as evidenced in this section.

This will directly increase the existing road safety concerns, due to the road blockages leading cars to reverse back out of Belvedere Rd on to the main Westbury Park Road, at a busy junction with Clay Pit Road, around corners where visibility is frequently blocked by parked cars.

Reason C: Loss of family housing and over-concentration of residential institutions

The application should also be rejected on the basis that the proposed development would result in the loss of affordable homes for young families and an over-concentration of residential institutions on Belvedere Road, which would harm the mix, balance and inclusivity of the community.

7 Belvedere Road is situated within 500m of two children's nurseries (Torwood Lodge and The Red House) and Westbury Park Primary School, making it an ideal and desirable location for young families.

It is increasingly difficult for young families to afford to buy traditional family homes. Westbury Park is an expensive area, and Westbury Park Primary School is an excellent state primary school with a catchment area of just 740m^{xxiii}. The three flats/maisonette at No. 7 provide large 2-bedroomed rented accommodation, making them an affordable option for young families with a child at the school or nursery. The loss of this type of accommodation makes it harder for any but the most wealthy families to live in this area or have access to the school.

Bristol City Council is prioritising development of "liveable neighbourhoods" in which residents should be able to access most day-to-day facilities within a 15 minute walk. This is already the case for residents of Belvedere Road, with local shops and cafes (Coldharbour Road and North View) and outdoor space (the Downs) accessible within a 10 minute walk. It is an ideal area for young couples and families to live in.

(Sadly, most residents of the nursing homes suffer from advanced dementia and are unable to leave the nursing homes to use the local facilities.)

Belvedere Road is 150m long. There are currently 3 nursing homes in the road – Belvedere Lodge (20 beds), Meadowcare Home (34 beds) and Glenview Nursing Home (40 beds). All are residential nursing homes for patients with dementia. They currently occupy 5 out of 11 buildings on one side of Belvedere Road. The proposed extension would result in 6 of the 11 buildings being occupied by nursing homes, with a total of 106 beds.

Supporting data indicates that within the entire Redland Ward, there is already a vast overconcentration of nursing homes in this one small road. Data from the CQC show that the only registered care homes in the Redland Ward are:

| Registered Care Home | No. of Beds | In Manor Park LSOA | In Redland Ward | Dementia (65+) care | Address |
|----------------------|----------------|--------------------------|-----------------------|------------------------|---------------------|
| Meadowcare | 34 | YES | YES | YES | 2-3 Belvedere Road |
| Glenview | 40 | YES | YES | YES | 8-9 Belvedere Road |
| Belvedere Lodge | 20 | YES | YES | YES | 1 Belvedere Road |
| 6 Northumberland Rd | 5 | NO | YES | NO | 6 Northumberland Rd |
| 35 Cranbrook Road | 5 | NO | YES | NO | 35 Cranbrook Road |

This shows that:

- 100% of all care homes in the Manor Park LSOA are located in Belvedere Road.
- 100% of Nursing Homes (for elderly/dementia care) in the whole Redland Ward are located in Belvedere Road.

Already one small road, 150m long containing 21 buildings, caters for almost the entire population of care homes in this Ward of 13,200 people.

The average household size in Belvedere Road and the neighbouring roads is 1.92 (Attachment 8 shows the supporting data, extracted from streetcheck.co.uk). If the development went ahead, only 36 of the 42 addresses on the street would remain residential, leading to an estimated average residential population of 69. The population of the nursing homes would increase to 106 – significantly outnumbering the residential population of this road.

It should also be noted that Freeways at No. 2 The Glen (in the adjoining road) provides 15 units of supported living for severely disabled adults, and Abbeyfield (in adjoining Redland Road) provides 17 units of supported living for the elderly, both of which further add to the concentration of residential institutions in these roads.

It should therefore be clear that approving the application would lead to the further overconcentration of nursing homes in just one small road, and a loss of affordable housing for young families.

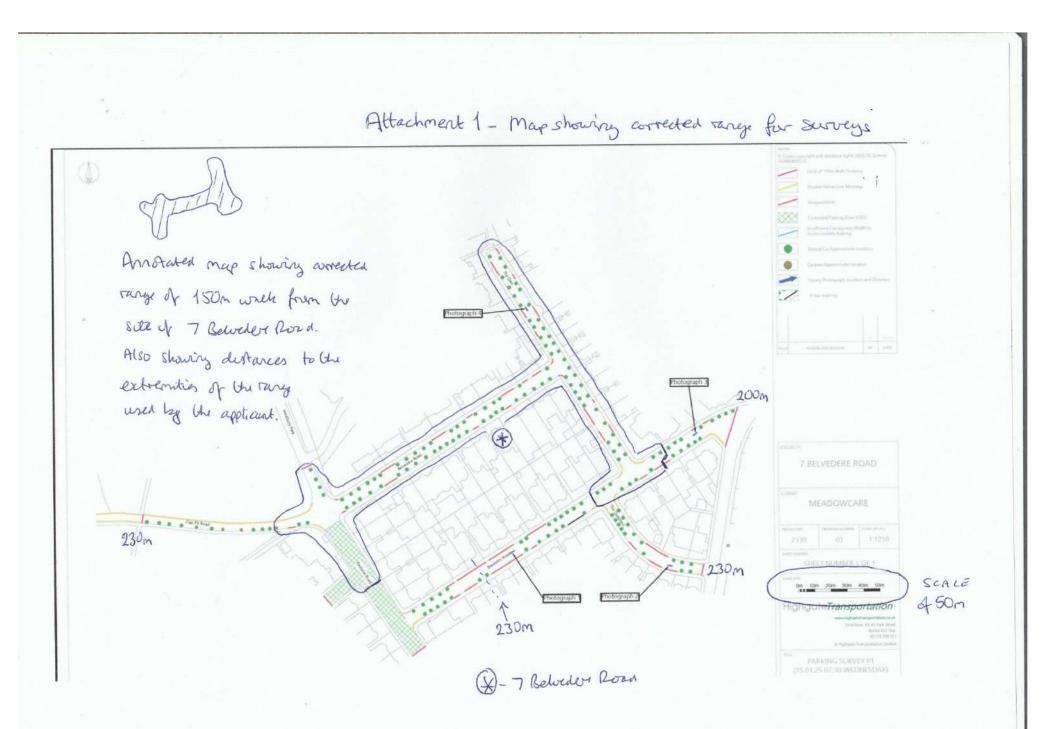
Cross-reference Endnotes

All planning documents referred to are from this application unless a different application number is shown.

| i Staff Travel Plan March 2025 ii Technical Note On Street Parking Stress Surveys Appendix 1 iii | |
|--|----------|
| ^v https://www.bristol.gov.uk/files/documents/4342-03-5-3-car-park | ing/file |
| ^{vi} Planning Statement Rev B 29 April 2025 paragraph 6.4 | |
| vii | |
| | |
| viii | |
| / | |
| ix | |
| × 22/01529/F Planning Statement Paragraph 6.32 | |
| ^{xi} 20/06030/F Transport Statement Paragraph 3.1 | |
| ^{xii} 19/03104/F Transport Statement Paragraph 3.1 | |
| ^{xiii} Planning Statement Rev B 29 April 2025 paragraph 6.4 | |
| xiv | Page 96 |
| XV | |
| ^{xvi} Transport Statement 9.19 | |
| ^{xvii} Application 20/06030/F Transport Statement paragraph 6.1 | |
| ^{xviii} Servicing Management Plan paragraph 2 | |
| xix | |
| | |
| ×× Service Management Plan paragraph 2 | |
| ^{xxi} Transport Statement 9.19 | |

^{xxii} Transport Statement 9.19

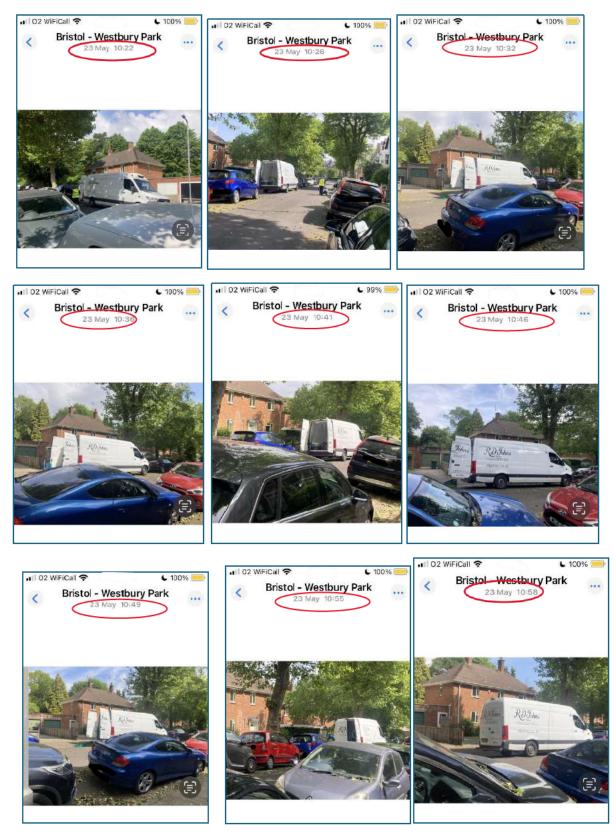
^{xxiii} https://www.bristol.gov.uk/files/documents/3399-westbury-park-primary-school-allocation-and-appeal-2022/file



Objection to S62A/2025/0101 7 Belvedere Road, Westbury Park, Bristol, BS6 7JG – Attachments 1, 5, 6

Attachment 5 - Duration of food deliveries to Glenview

First photo (10:22) shows van completing delivery to Meadowcare, parked in driveways of 20/21 Belvedere Road. Second one (10:26) shows van moved to driveways of 18/19 Belvedere Road to deliver to Glenview. Subsequent ones show van parked while delivering to Glenview, completing soon after last one (10:58).



Objection to S62A/2025/0101 7 Belvedere Road, Westbury Park, Bristol, BS6 7JG – Attachments 1, 5, 6

Attachment 6 – Log of Ambulance Visits 16th – 30th May 2025

NB – these are just the ones able to be recorded by residents, so this is the minimum number during a typical fortnight.

| Date | Time | Description |
|------------|-------|--|
| 16/05/2025 | 08:45 | Ambulance blocking road servicing Glenview |
| 17/05/2025 | 12:52 | Ambulance blocking road (by Meadowcare) |
| 21/05/2025 | 08:35 | Ambulance blocking road servicing Glenview |
| 21/05/2025 | 10:15 | Ambulance blocking drive (No. 15) servicing Glenview |
| 22/05/2025 | 10:45 | Ambulance blocking drive (No. 15 and 16) servicing Glenview |
| 27/05/2025 | 11:24 | Ambulance blocking road |
| 27/05/2025 | 15:55 | Ambulance blocking road |
| 27/05/2025 | 22:05 | Ambulance blocking road servicing Glenview |
| 28/05/2025 | 07:33 | Ambulances #1 blocking road servicing Glenview |
| 28/05/2025 | 07:49 | Ambulances #2 blocking road servicing Glenview (arrived with Amb #1 but stayed longer) |
| 28/05/2025 | 13:42 | Ambulance blocking drive (No. 15 and 16) servicing Glenview |
| 28/05/2025 | 15:54 | Ambulance blocking drive (No. 15 and 16) servicing Glenview |
| 29/05/2025 | 07:51 | Ambulance at Glenview |
| 29/05/2025 | 13:49 | Ambulance blocking road |
| 29/05/2025 | 15:55 | Ambulance servicing Glenview |
| 30/05/2025 | 17:45 | Ambulance blocking road (by Meadowcare) |