



## City Transport

### *Transport Development Management*

### *Application Response*

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**To:** [REDACTED], Planning Team  
**From:** [REDACTED] Transport Development Management  
**Date:** 04 September 2025  
**Address:** Chasefield House 888 Fishponds Road Fishponds Bristol BS16 3XB  
**Application No:** 25/13176/PINS  
**Proposal:** Conversion of existing care home (C2) to provide 2x large Sui Generis HMOs (9x + 10x beds)  
**Response:** Initial  
**Recommendation:** Refuse

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#### Principle / Property History

1. The application is for the conversion of an existing care home (C2) to create 2x HMOs with 9x and 10x beds and external alterations.
2. The application 22/02990/F, for 2x HMOs largely identical in layout and quantum to the current application, was refused solely on highway safety grounds that the surrounding area could not adequately demonstrate sufficient capacity to accommodate the additional car parking demand expected to be generated by the development. TDM refers throughout these comments to its memo dated 19 June 2023 in response to that application.
3. Related applications at the site include 25/11020/F, for the construction of 5x dwellings to the rear of no.888, is currently pending consideration and at the time of writing will be refused on highway safety grounds; and 22/04673/F, a similar application for 7x dwellings at the rear of no.888, which was refused on highway safety grounds.
4. Related applications at nearby sites include 19/00920/P, for the demolition of 13x garages and erection of 6x 2-bedroom semi-detached dwellings at the rear of 884-886 Fishponds Road, which was approved.

#### Highway Network

5. The site is located at the confluence of Downend Road (A432) and Staple Hill Road (B4465), where they become Fishponds Road (A432). All are subject to a 20mph speed limit.

6. The applicant claims throughout the Planning Statement dated 10 June 2025, and particularly at pp.14-15, that the site is 'sustainably located' and residents would not need a car to access local services and facilities. TDM notes that only limited transport assessment has been undertaken with no analysis of local bus service frequency, reliability, the accessibility and topography of local cycle and walking routes, or any audit of the quality and attractiveness of pedestrian routes in the immediate vicinity of the site. In the absence of a serious assessment, TDM is anecdotally aware of problems TDM avers that the high levels of parking stress detailed further below and in previous correspondence relating to 22/02990/F observed in a relatively suburban, low-rise location speaks to the common reliance on private vehicles for journeys other than local ones.
7. The applicant notes at p.15 of the Planning Statement the presence of 2x car club bays approximately 290m and 600m near the site. The applicant did not propose in the Premises Management Plan dated May 2023 submitted with the previous application to provide incentives to residents to sign up as members of the car club scheme and no such PMP is submitted now. The scale of the development is such that no travel plan is required and a condition requiring subsidy for car club membership is not proportionate to the scale of the development. While it is accepted that residents might be signed up or could do so after moving in, there is no guarantee and this is not considered adequate mitigation of the parking impact of the development.
8. Recent recorded traffic incidents on the nearby highway network include the following at the (no formal crossing facilities) of Fishponds Road and Staple Hill Road immediately in front of the site:
  - a. on 13/01/2017, a motor vehicle and pedestrian incident with one casualty;
  - b. on 04/12/2017, a nose-to-tail motor vehicle incident with one casualty;
  - c. on 09/09/2021, a serious nose-to-tail motor vehicle and cycle incident with one casualty;
  - d. on 03/05/2022, a vehicle and cycle incident with one casualty; and
  - e. on 01/05/2024, a vehicle and cycle incident with one casualty.

the following on the stretch of carriageway without formal crossing facilities between the Fishponds junction and Beechwood Road approx. 325m Southwest of the site:

- f. on 09/11/2022, a motor vehicle and pedestrian incident with one casualty;
- g. on 30/12/2023, a motor vehicle and pedestrian incident with one casualty; and

the following near the Fishponds Road/Guinea Lane/New Station Road junction (no formal crossing facilities) 450m Southwest of the site:

- h. on 05/03/2019, a motor vehicle and pedestrian incident with two casualties;
- i. on 13/02/2020, a motor vehicle and pedestrian incident with one casualty;
- j. on 27/09/2020, a motor vehicle and pedestrian incident with one casualty;
- k. on 11/08/2021, a motor vehicle and pedestrian incident with one casualty;
- l. on 25/09/2024, a motor vehicle and pedestrian incident with one casualty; and

the following at the Staple Hill Road/Maywood Road junction (no formal crossing facilities) 300m to the East of the site:

- m. on 30/03/2021, a motorcycle and pedestrian incident with one casualty.

9. The incidents highlighted **red** above have been recorded since the previous largely identical application 22/02990/F at the site.

### **Access**

10. The applicant proposes on GF plan no.4101C site access on the same basis as previously shown on the final GF plan no.3101H submitted with 22/02990/F in May 2023. The existing 2x vehicle entry/exit points are retained and a swept path analysis drawing no.T25586-001 demonstrates that a large car can enter the site, park in either parking space, and turn left out on Fishponds Road in forward gear. Access by a 4.6t light van is also demonstrated without affecting the car parking spaces.
11. Pedestrian access to the main steps into each HMO is slightly restricted by the position of the parking spaces, which leave a gap of only 0.85m next to the porch structures. There is separate access to cycle storage.

### **Car Parking**

#### *Existing lawful site use*

12. The applicant suggested by email dated 26 June 2023 at the time of the previous application 22/02990/F that the existing lawful use – being a 15-bed care home in Use Class C2 – could generate need for 10.5x parking spaces, 7.5x of which would need to be found on the local highway network (accounting for 3x on-site spaces) in excess or equal to those required to be found for the proposed HMOs. TDM commented at the time that the applicant appears to be referring to the Local Plan parking schedule for Use class C2 – Residential Institutions and the specific provisions for ‘convalescent and residential care homes’. TDM does not accept this shows that this number of cars can be accommodated locally, however, because the schedule sets out the maximum permitted number of on-site car parking spaces, rather than an estimate of the parking demand the developed site is likely to generate, which can instead be derived from Census data. It is also stated that this number can be applied flexibly depending on local conditions.

#### *Proposed site use*

13. At the time of the previous application 22/02990/F, TDM estimated that the proposed development would generate demand for 7x vehicle parking spaces (38.71%) based on car ownership data for the average 1-3 -bed apartment in the Frome Vale 2011 Census merged wards area (E23000539). Car ownership rates in Bristol have risen since then and the 2021 Census estimated that 43.66% of 1-person privately rented households in Bristol own a car. Given that 22/02990/F proposed to retain no off-street parking spaces at the site, all 7x vehicles would have needed to be parked on nearby streets.
14. The applicant submitted a parking survey dated April 2022, purporting to show 9x (Monday) - 14x (Tuesday) unoccupied on-street spaces (excluding time-restricted spaces) within 150m walking distance from the site on Vassal Court, Lawn Road, Downend Road, and Staple Hill Road. TDM disputed the validity of the findings and

requested by email on 2 June 2023 a revised parking survey that complied with the Council's [Parking Survey Methodology](#), which prohibits the counting of spaces on the opposite side of classified roads without dedicated crossing facilities.

15. The applicant has previously questioned the principles underlying BCC's Parking Survey Methodology. TDM refers to its memo dated 19 June 2023 and the justification set out therein for the Methodology guidelines for determining what constitutes an 'available space' that should properly be counted in the total number of on-street parking spaces. TDM notes that, in the time since the previous application was refused, at least 2x further collisions have occurred between motor vehicles and pedestrians on parts of Fishponds Road within 450m of the site that do not feature dedicated crossing facilities. TDM considers that the continually high incidence of such collisions further justifies the principle in BCC's Parking Survey Methodology of discounting spaces on the opposite side of classified roads.
16. TDM argued in response to 22/02990/F that it was not possible to tell from the April 2022 parking survey whether there were sufficient parking spaces available on the South side of Fishponds Road/Staple Hill Road, i.e., without needing to cross a classified road, to meet the additional demand; however, the applicant's planning agent confirmed by email dated 26 June 2023, that:

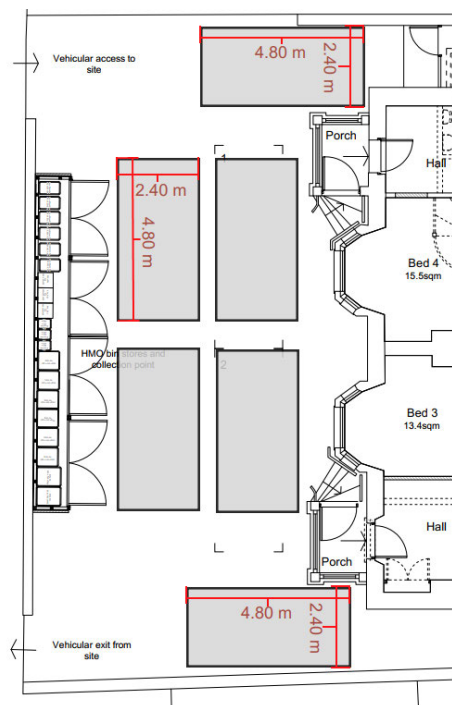
If the parking survey in this case, with the 150m radius, is restricted to: (i) the spaces on the southern side of the highway (whereby no crossing over the A or B roads would be necessary); and (ii) wholly unrestricted spaces (i.e. discounting the spaces subject to daytime restrictions only); then based on the results of the survey, there would only be 1 available space on the first day of the survey and 2 available spaces on the second day. In

17. Despite several requests, the applicant did not submit a revised parking survey and it appears no parking survey has been submitted to support the current application.
18. The proposed increase in the number of bedrooms at the site means parking demand is likely to exceed existing capacity on nearby streets. TDM is concerned that adding to existing parking congestion in this area would result in inappropriate on-street parking practices, such as footway parking and/or near junctions, that cannot reasonably be accommodated or controlled, and would therefore detrimentally impact pedestrian amenity and safety on the footway and reduce visibility at junctions to the detriment of the highway safety. Moreover, residents might be incentivised by the lack of capacity to park further from the site on the opposite side of classified roads without adequate crossing facilities, which is deemed unsafe by the Parking Survey Methodology and would exacerbate an ongoing safety issue with pedestrian crossing movements resulting in traffic collisions. The proposals would therefore fail to comply with **DM2, DM23, DM28, BCS10, NPPF Part 9**.
19. TDM avers as previously that the impact of on-street parking demand associated with the proposed use cannot be mitigated or off-set by any demand arising from the existing lawful use as a C2 care home, which, by the applicant's admission at p.7 of the Planning Statement dated 10 June 2025, has been vacant for over 5x years and cannot be

reopened in that use due the impossibility of complying with current CQC standards.

### *Off-street car parking layout*

20. The proposed GF plan no.4101C shows 2x tandem off-street car parking spaces measuring 2m x 6m. While the number of existing parking spaces is not defined, it is clear that the introduction of dedicated refuse container storage and a second porch will reduce the currently available parking space. However, TDM is not convinced that adequate controls can be enforced to prevent ad-hoc off-street car parking outside of the designated spaces, due to the need to maintain clear areas for vehicle manoeuvring and off-street loading. A gate or fob access is not realistic or desirable to avoid. In the event, TDM considers it likely that residents would park their cars.
21. The effect of additional parked cars would be to restrict manoeuvring space such that drivers could be forced to reverse onto Staple Hill Road with visibility limited by the existing wall, which exceeds 0.6m in height. Although TDM accepts this is the current situation, the intensification of the site to create 2x HMOs, whose residents are unlikely to know each other or coordinate schedules and leaving times, would dramatically increase the demand for parking spaces, the frequency of trips, and the risk of collision with road users on Staple Hill Road.



22. TDM is concerned that the intensification of use of site access points and applicant's inability to enforce off-street parking controls in the current layout would result in an overconcentration of uncontrolled on-site car parking and force residents to perform unsafe turning or reversing manoeuvres onto classified roads with inadequate visibility of oncoming traffic. The proposals would fail to provide an appropriate level of safe, secure, accessible and useable parking provision and would fail to provide safe and adequate access onto the adopted highway network, and are therefore contrary to **DM23, BCS10, NPPF Part 9**.

### *Future parking permit scheme*

23. There is no local residents' parking scheme either in effect or proposed, but the applicant should note that TDM will not allow the new dwellings to benefit from any future parking scheme. The absence of any formal consultation or plan for a local residents parking scheme does not give confidence that the likely on-street parking impacts of the scheme can be adequately mitigated in accordance with **DM2** if approved and implemented in the near future. Furthermore, additional on-street parking restrictions would not mitigate the detrimental impact on highway safety of uncontrolled off-street parking within the forecourt at the site, as described above.

### *Removal of external stairs*

24. As with the previous application, the applicant proposes to remove the external stairs to enable

### **Cycle Storage**

25. The applicant proposes 18x cycle storage spaces in a similar layout to the previous application 22/02990/F, which was deemed acceptable.

### **Waste**

26. The applicant has provided drawing no.4500C the proposed refuse store at the site and the relevant containers. The proposed storage is acceptable.

### **Recommendation**

27. Having regard to submitted details of the proposed property layout and associated facilities, TDM is unable to confidently assert that the proposed development will provide safe and adequate vehicle access to the on-site parking spaces, due to the applicant's inability to control access, and will not give rise to unacceptable traffic conditions due to the failure to provide an appropriate level of safe, secure, accessible, and useable off-street car parking. It is therefore unlikely that the development as proposed will comply with the provisions of **DM2, DM23, DM28, BCS10, NPPF Part 9**.
28. The development is considered unacceptable and TDM recommends refusal of the application.

**29. Without Prejudice to the above recommendation, if the Inspector were minded to approve, TDM would recommend the following conditions and advices:**

### **Pre occupation conditions**

- C5B Implementation/Installation of Refuse Storage and Recycling Facilities – Shown on Approved Plans
- C7B Completion of Vehicular Access – Shown on Approved Plans
- C8A Completion of Pedestrians/Cyclists Access – Shown on Approved Plans

C12A Completion and Maintenance of Car/Vehicle Parking – Shown on Approved Plans

C13A Completion and Maintenance of Cycle Parking Provision – Shown on Approved Plans

**Car parking, access and highway safety**

D19A Restriction of Parking Level on site

**Advices**

I043B Impact on the highway network during construction

I045A Restriction of Parking Permits – Future Controlled Parking Zone/Residents Parking Scheme

I055 Street Name and Numbering