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Date: Tuesday 9 October 2012  
Ref: 12/02090/F

Dear Peter

**Planning application: 12/02090/F (validated 4 May 2012)**

**Application address: Bristol Rugby Football Club, Memorial Stadium, Filton Avenue, Bristol BS7 0AQ**

**Description:**

**Redevelopment of site comprising demolition of stadium and all related structures and erection of 11,838 sq m foodstore (9,346 sq m gross/4,851 sq m net) with 572 undercroft car parking spaces, 47 cycle spaces, 65 residential units (houses and apartments) and 380 sq m community/commercial floorspace. Associated works comprising hard and soft landscaping, enlargement of vehicular access to Filton Avenue and creation of mini roundabout on Filton Avenue, involving demolition of nos. 29 and 31 Filton Avenue. (Major application)**

Net retail floorspace – 70% (3,396 sq m convenience), 30% (1,455 sq m comparison)

Housing (total of 65 units – 100%):

Market housing (39 – 60%): 5 x one-bed flats; 13 x two bed flats; 6 x two-bed houses; 15 x three-bed houses;

Social rented (19 – 29%): 10 x two-bed flats, 9 x three-bed

Intermediate housing (7 – 11%): 3 x two bed flats; 2 x two-bed houses; 2 x three-bed houses;

**Bishopston ward**

**Site area: 3.3 hectares**

Thank you for your consultation letter received on 22 May 2012.

## **1. SUMMARY**

Although there are many positive elements to the proposal, there are significant concerns with the development and therefore it is recommended that the application is refused on the grounds of:

### **A. Adverse impact on the local economy and local employment (NPPF)**

People in employment are healthier, particularly those who have more control over their working conditions. We estimate that there will be a net job loss of between 133 – 197 retail jobs, with probably further job losses in the local wholesale and distribution chain and from local suppliers.

### **B. Adverse impact on the character, diversity, vitality and viability of local centres (policy BCS7 & NPPF)**

Local centres can have an important role in providing places for social interaction, community cohesion and giving places a sense of identity. This helps promote social capital and wellbeing. Conversely, a declining centre with vacant and boarded up shops has a negative impact on people's sense of wellbeing. We estimate there could be a loss of up to 62 smaller shops, with the losses concentrated on Gloucester Road and Whiteladies Road. If Sainsbury's superstore has a higher turnover to floorspace ratio then the loss will be even higher. The proposed development will have a significant impact, both in quantitative terms (loss of turnover, jobs, floorspace) and qualitative terms (loss of character and diversity) on Gloucester Road and Whiteladies Road.

### **C. Adverse impact on active travel and encouraging car dependency (policy BCS10 & NPPF)**

The proposed development is car dependent and the application shows no real commitment to promote active travel and sustainable transport or applying the transport user hierarchy. The opportunities the proposed development does give for the take up of sustainable transport modes are undermined by the excessive amount of car parking that will lead to greater car dependency. There is no Travel Plan for customers of the proposed superstore.

### **D. Adverse impact on travel to and from Southmead Hospital (policy BCS3).**

Southmead Hospital is only  $\frac{3}{4}$  of a mile away and is currently being redeveloped as a 784-bed 'super hospital' at Southmead employing 6,500 (FTE) staff and is due to open in 2014. Increasing congestion will undermine the hospital's travel plan, and will make journey times more unreliable for patients, staff, visitors, deliveries, ambulances and urgent and non-urgent patient transport with knock-on impacts on the smooth running of the hospital services.

### **E. Adverse impact on the quality of the place (policy BCS21 & NPPF).**

It is disappointing that the opportunity for an imaginative mixed-use development in keeping with the urban grain of the area has not been taken.

### **F. Adverse Impact on food security and resilience.**

Considering the issue of future food security, there is an argument that the current 'supermarket business model' is not sustainable and does not support the resilience of the food supply system. Resilience is built on diversity. This is threatened by the

increasing domination of the food retail sector by the 'Big Four' (Tesco, Asda, Sainsbury and Morrisons) multiple food retail, both nationally and locally. Further supermarket/superstore development such as the Sainsbury's proposal for the Memorial Stadium will further threaten the diversity of supply chains and thus the resilience of the food supply system.

### **G. Adverse impact on climate change (policies BCS13 & NPPF).**

The Climate Change Act 2008 and Bristol's Climate Change and Energy Security Framework (February 2010) set targets to reduce greenhouse gas emissions. Notwithstanding the sustainability credentials of the buildings themselves (BREEAM excellent and CSH level 4), there will be additional carbon emissions from the demolition and new construction and from the on-going operation of the superstore and the additional car trips, when the national and local targets are to reduce carbon emissions.

## **2. INTRODUCTION**

The impact of development on people's health and wellbeing is a material consideration in planning decisions.

Bristol's Core Strategy (June 2011) aims to deliver "A safe and healthy city made up of thriving neighbourhoods with a high quality of life" and has "Better health and wellbeing" as one of its eleven objectives.

Bristol's JSNA's strategic summary (2012) states that:

"In Bristol, as elsewhere, key determinants of health in each area include: the quality of housing, the local physical environment and access to open spaces, transport infrastructure, feeling safe and freedom from fear of crime as well as the prevailing attitudes to lifestyle issues in different communities...

"...the main source of pollution in cities is road traffic, though Bristol's carbon emissions are reducing, and per capita are the lowest of the Core Cities. Active Travel is an example of a healthy lifestyle change that also contributes to a reduction in pollution ("healthy city, healthy people").

"Overall though, a healthier city will not come just from individual actions, but needs an integrated approach to planning the built environment to create a supportive environment and infrastructure for a Healthy City. This needs to focus on areas with poor health outcomes and inequalities (eg Inner City or South Bristol) and to take account of the health impact of living in the city in the future, eg: improving access to green spaces and to shops selling healthy food, as well as incorporating sustainability issues for a healthier future."

To help ensure these issues were addressed, at the pre-app stage a health impact assessment was requested under Core Strategy Policy BCS21 and draft policy DM12 (March 2012), and still extant Regional Planning Guidance for the South West (RPG10 - September 2001) policy EN5. Advice was also given on its scope (see Appendix 1). It is disappointing that a HIA was not undertaken, that the issues have

not been addressed in the final application and that the outcomes from such assessment (had it taken place) have not influenced the submitted planning application.

The scheme is significantly bigger than the proposal that was subject to pre-app public consultations in April 2012:

|                       | Pre-application submission – Jan 2012 | Current planning application      | Change | % change |
|-----------------------|---------------------------------------|-----------------------------------|--------|----------|
| Floorspace            | 8,060 sq m gross                      | 11,838 sq m<br>(9,346 sq m gross) | +1,286 | +16.0%   |
| No of dwellings       | 44                                    | 65                                | +21    | +47.7%   |
| No of car park spaces | 450                                   | 572                               | +122   | +27.1%   |

If approved, with 4,851 sq m net retail floorspace, it will be the largest superstore in North Bristol and the second biggest in Bristol, after the Tesco Extra at Callington Road (5,707 sq m). It will be bigger than Tesco's Eastville (4,698 sq m), Tesco's Golden Hill (4,652 sq m), Sainsbury's Castle Court (3,716 sq m), Sainsbury's, Winterstoke Road - 4,774 sq m) and ASDA Bedminster (4,733 sq m). With 572 spaces it will have the largest car park of any free-standing superstore in Bristol.

There are some good elements to the proposed development:

- The target to achieve BREEAM 'excellent' for the retail and community/commercial development.
- The target to achieve Code for Sustainable Homes level 4 and Lifetime Homes for the residential development.
- The proposal, as a building, has a number of good sustainability features, even though the potential of the flat roof for solar power, green roof and rainwater collection has not been maximised.
- A significant potential benefit of the development is the on-site renewable energy installations, and this is to be welcomed.
- The increase in permeability compared to the current sports stadium
- The mix (albeit limited) of uses

However, there are major concerns with the proposal, which are set out over the following pages and therefore it is recommended that the application is refused.

#### **A. Adverse Impact on the Local Economy and Local Employment (NPPF)**

People in employment are healthier, particularly those who have more control over their working conditions. Thus the employment at Sainsbury's superstore is to be welcomed, however this has be balanced by concern for consequential job losses elsewhere.

A report by the Association of Convenience Stores<sup>1</sup> report challenges many of the claims that supermarkets make about the number of jobs created and the assumptions underlying them. It also states that “Head count job creation figures are misleading” and recommends the use of FTE (full-time equivalents) to measure job creation.

The applicant’s Economic Statement is not adequate in that only looks at the Sainsbury’s development in isolation and it does not use FTEs. There is an implication that every job created on site is a net new job for the city. This is highly misleading as it does not consider jobs lost elsewhere, nor at the increasing use of technology and self-servicing in large stores leading to further job losses in the future.

Sainsbury’s state that there will be up to 350 jobs (so there could be less) at the store, up to 245 fulltime jobs and up to 105 part time jobs. Assuming a conversion rate of three part-time jobs to one full time job gives a total 280 FTEs (245 + 35).

Using figures from Sainabury’s Economic and Retail Statements it can be estimated that the 350 new jobs will be balanced by the loss of between 483 and 547 retail jobs elsewhere, including the loss of 58 jobs on Gloucester Road and 82 jobs on Whiteladies Road (see Appendix 3). Thus, the development of the Sainsbury’s superstore will result in a net loss of at least 133 – 197 retail jobs.

There is likely to be further job losses in the local wholesale and distribution chain and from local suppliers.

With local independent stores with local owners, employing more local people and using local producers and suppliers then money circulates around the local economy more than money spent in supermarkets, where a higher proportion leaves the local economy to pay headquarter staff, shareholders, national and international producers and suppliers. Thus the loss of jobs in the local independent sector will have a negative multiplier effect.

Research by the New Economics Foundation<sup>2</sup> using their Local Multiplier 3 (LM3) methodology shows that money spent in local businesses can be worth up to 400% more. Every £1 spent with a local supplier is worth £1.76 to the local economy, but only 36 pence if it is spent externally.

Any employment created at the proposed new football stadium at UWE Frenchay is not relevant to this application, as in the long-term this will be due to the success, or otherwise, of Bristol Rovers as a football club, not the new stadium or its relocation.

The NPPF encourages the planning system to support sustainable economic development as one its core principles (para 17). This development will have an

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<sup>1</sup> Association of Convenience Stores (July 2010) “Job Creation Claims in New Supermarket Retail Development”

<sup>2</sup> New Economics Foundation (December 2002) “The Money Trail: measuring your impact on the local economy using LM3” and New Economics Foundation (Sept 2002) “Plugging the Leaks: making the most of every pound that enters your local economy” – [www.pluggingtheleaks.org](http://www.pluggingtheleaks.org)

adverse impact on the local economy and does not support sustainable economic development and thus should be refused.

## **B. Adverse impact on the character, diversity, vitality and viability of local centres (policy BCS7 and NPPF para 27, 69 & 70)**

Local centres can have an important role in providing places for social interaction, community cohesion and giving places a sense of identity. This helps promote social capital and wellbeing. Conversely, a declining centre with vacant and boarded up shops has a negative impact on people's sense of wellbeing.

The proposed development, which will be the largest superstore in North Bristol, is not within a designated centre (policy BCS7).

A range of reports by the New Economic Foundation<sup>3</sup> highlighted concerns that the growth of retail multiple chains and the decline in independent stores, was leading to a loss of diversity and local character in our town centres and the growth of what they have called 'Clone Town Britain'.

Gloucester Road has been called<sup>4</sup> "The Last Great British High Street" and is a rare example of a shopping centre that still has a strong independent sector. It is important that this quality and character, which cannot be taken as guaranteed and is what provides its diversity, vibrancy, vitality and viability, is protected.

The applicant refers to the Bristol Citywide Retail Study that took place in 2007, prior to the banking and financial crisis and the national and international economic slowdown and recession. Thus many of its findings no longer hold true. Many centres will be less healthy than was reported then. In addition, pop-up shops and galleries, charity shops and other uses can mask the underlying vacancy rate and give a superficial impression of the vitality and viability of centres that can actually be quite vulnerable.

There are already a number of superstores in the catchment area, as identified in the Retail Statement (page 19-20 and Appendix H), and on the edge of it, but not listed in it, eg Sainsbury's at Castle Court, Asda at Bedminster and Asda and Morrison's at Cribbs Causeway. So an additional Sainsburys' superstore at the Memorial Stadium will not increase competition or meet an unmet need.

Sainsbury's Retail Statement (Figure 5.5, page 42) highlights the significant loss of retail trade from Gloucester Road shops (6% of convenience and 5% of comparison turnover) and Whiteladies Road shops (9% of convenience and 8% of comparison turnover). However there are a number of assumptions underpinning this that are questionable in the current economic climate. If they do not hold then the situation will be even worse. The Retail Statement does not take into account any increase in internet shopping and assumes an increasing expenditure per person. Given the

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<sup>3</sup> New Economics Foundation – "Ghost Town Britain" (December 2002); "Ghost Town Britain II: Death on the High Street" (December 2003); "Clone Town Britain" (June 2005); "Reimagining the High Street: escape from Clone Town Britain" (September 2010).

<sup>4</sup> Independent 8 August 2012 - [www.lovegloucesterroad.org.uk](http://www.lovegloucesterroad.org.uk)

current national and international economic situation, it is unlikely that expenditure levels will return to pre-2008 levels in the near future, let alone actually increase.

Two reports published by Deloitte<sup>5</sup> this year on the changing face of retail report that retail floorspace contracted in 2009 and 2010 and that almost 15,000 shops in UK town centres closed between 2000 and 2009 and a further 10,000 closing in 2010 and 2009. They foresee 30% - 40% of shops closing over the next 3-5 years.

A recent report by the Local Data Company, "Too Many Shops" was widely reported in the media<sup>6</sup>. This showed an increase in shop vacancy rates in all regions, except London. Martin Hopkinson, the director of Local Data Company was quoted as saying "We probably have 20,000 too many shops".

It is clear that there is currently no demand for additional retail floorspace. So any new retail floorspace will be at the expense of existing shops closing. To put this in context, shops on Gloucester Road range in size from 30 sq m to the Co-operative store at 1,410 sq (Source: Goad retail data) with an average size of about 150 sq m. So an additional 9,346 sq m gross floorspace is likely to lead to a loss of a about 62 shops of 150 sq m. These losses will be concentrated on Gloucester Road and Whiteladies Road. If Sainsbury's has a higher turnover to floorspace ratio then the loss will be even higher.

Sainsbury's retail statement only considers the impact on other centres. It does not consider the impact of on small local parades and shops in North Bristol (eg Danby House (Lockleaze), Filton Avenue (Horfield), Southmead Road, Kellaway Avenue, Ashley Down Road).

For many people, particularly if they have restricted mobility these provide more than just 'top-up' shopping. And if they close because of the loss of trade to the proposed superstore then there will be a reduction in access to food in these areas. It is also worth noting that access to small local parades and shops will more likely to be by walking. So the closure of a local shop could see short walking trips substituted by longer car-bourne shopping trips

Thus losing numerous small shops and replacing them with one superstore has a negative impact on health inequalities because it disadvantages elderly, frail, and disable people and non-car using members of the community. Their access to local shopping is significantly reduced.

The NPPF states that planning "should ensure that established shops, facilities and services are able to develop and modernise in a way that is sustainable and retained for the benefit of the community" (para 70) and promote "opportunities for meetings between members of the community who might not otherwise come into contact with each other, including through...strong neighbourhood centres and active street frontages, which bring together those who work, live and play in the area" (para 69). The proposed development runs counter to this.

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<sup>5</sup> Deloitte (February 2012) "The Store of the Future: the new role of the store in a multi-channel environment" and Deloitte (September 2012) "Rightsizing the Retail Estate"

<sup>6</sup> Guardian 4 September 2012; Telegraph 4 September 2012; Planning 4 September 2012.

The NPPF promotes the vitality of town centres and is very clear that where an application is likely “to have a significant impact...it should be refused” (para 27). The proposed development will have a significant impact, both in quantitative terms (loss of turnover, jobs, floorspace) and qualitative terms (loss of character and diversity) on Gloucester Road and Whiteladies Road and thus should be refused.

### **C. Adverse impact on active travel and encouraging car dependency (policy BCS10 and NPPF paras 29, 30, 32, 34, 35 & 36)**

One of the 12 core planning principles in the NPPF is “take account of and support local strategies to improve health, social and cultural wellbeing for all..” The Active Bristol Strategy (January 2011) is one of these local strategies and two of its ambitions are to “encourage active travel as a means of getting to school and work and as part of everyday life” and “develop planning policy and practice which supports an increase in physical activity and facilitates healthier lifestyles for all who live in our city” (page 3).

The proposed development is car dependent and the application shows no real commitment to promote active travel and sustainable transport or applying the transport user hierarchy (BCS10). For example, although there are travel plans for employees and residents, there is no travel plan for customers, who will be responsible by far for the most trips to and from the store.

The Transport Statement correctly concludes that:

“The proposed foodstore offers a local food shopping destination, within walking and cycling distance of a substantial customer catchment area and is located adjacent to one of Bristol’s showcase bus corridors. This offers the potential for a significant proportion of food trips to be made by non-car modes and the local infrastructure and public transport opportunities negate the need for customers of the proposed foodstore to travel by car.” (para 2.7.2, page 22)

“Overall, the development site is highly accessible by all modes of travel and the comprehensive non-car network will facilitate a significant proportion of trips to the site by non-car modes.” (para 2.7.4, page 22)

However this is not reflected in the proposal, which incorporates a 572 car park spaces (the largest car park of any free-standing superstore in Bristol), even though the applicant’s Transport Statement itself states there would be a maximum weekday car parking at 341 vehicles, based on TRICS data (para 3.9.3, page 28). This does not take into account the highly accessible location of this particular store, as highlighted above. So if the significant proportion of food trips by non-car modes was, say half, then there would only need to be 170 car parking spaces, not 572.

It is also worth noting that the proposal will not lead to any reduction in car parking elsewhere in Bristol. Instead there will be a net increase in off-street car-parking spaces in North Bristol of 572 spaces, which can only lead to an overall increase in car usage.

The opportunities the proposed development does give for the take up of sustainable transport modes are undermined by the excessive amount of car parking that will lead to greater car dependency.

Emissions from transport can have a serious effect on people's health. Exposure to poor air quality seriously affects the most vulnerable such as the very young, very old and people with cardio-respiratory problems. A key traffic pollutant is Nitrogen Dioxide (NO<sub>2</sub>), which is produced both from vehicle tailpipes, and from Nitrogen Oxides (NO<sub>x</sub>) emissions from vehicles that react in the air and turn into NO<sub>2</sub>. Gloucester Road is already in Bristol's Air Quality Management Area (2011) because of the existing high levels of NO<sub>2</sub> and particulate matter that are above national targets. This will be exacerbated by further increases in vehicular traffic and congestion.

Increases in vehicular traffic also raises concerns about road safety.

The NPPF states that all developments, which generate significant amounts of movement, should be required to provide a Travel Plan (para 36). There is no Travel Plan for customers of the proposed superstore.

This proposed development will lead to an increase in greenhouse gas emissions and an increase in congestion, contrary to para 30 of the NPPF and does not contribute to wider sustainability and health objectives (para 29). Thus it should be refused.

#### **D. Adverse impact on travel to and from Southmead Hospital (policy BCS3)**

Policy BCS3 promotes the regeneration of the Northern Arc, including the redevelopment of Southmead Hospital.

The proposed development will generate significant extra vehicle traffic that will cause greater congestion in the area, particularly on Gloucester Road (A38), which is already very busy. Many of the junctions in the area are already at or close to capacity for vehicles, without making provision for safe pedestrian and cycle movements. We have a particular and serious concern about how this will impact on Southmead Hospital, which is only  $\frac{3}{4}$  of a mile away and is currently being redeveloped.

Work is underway to construct a £430 million 784-bed 'super hospital' at Southmead that is due to open in 2014. This will accommodate all the 'acute' facilities currently split between the Southmead and Frenchay hospital sites, as well as community hospital facilities. It will include urgent care centre; diagnostic imaging; and inpatient rehabilitation. It has a total floorspace of 170,000 sq metres, employing 6,500 (FTE) staff and has 2,700 car parks spaces (75% for staff and 25% for visitors). The development is expected to achieve BREEAM for Healthcare 'excellent'. Several developments have already been completed as part of the new Southmead Hospital complex, including buildings for Pathology, Learning and Research, and a new Data

Centre. The Women and Children's Hospital and Avon and Wiltshire Mental Health Hospital are retained on the site.

Increasing congestion will undermine the hospitals travel plan, and will make journey times more unreliable for patients, staff, visitors, deliveries, ambulances and urgent and non-urgent patient transport with knock-on impacts on the smooth running of the hospital services.

Many of the hospital staff travel by public transport, and on foot and by bicycle. The traffic congestion will adversely affect public transport journey times and reliability, and will increase the hostility of the road environment for walkers and cyclists.

For ambulance transport both urgent and non-urgent, the congestion will increase the difficulty of providing an efficient and reliable service for patients. This will have knock-on adverse impacts within the hospital due to staff and patients being late for clinics and appointments.

This increase in congestion will be wide spread across the week and throughout the day, in contrast to the current position when congestion and parking problems from the stadium are at known times (usually the weekend), about once a week for about 40 weeks a year.

Thus the proposed development will have an unacceptable adverse impact on the provision of local and city-wide health services and thus should be refused.

#### **E. Adverse impact on the quality of the place (Policy BCS21 and NPPF paras 56, 57, 61, 62 & 64)**

The Memorial Stadium site is 3.3 hectares (8.2 acres). The redevelopment of such a large site in a dense urban area is a 'once in a lifetime' opportunity and ideally its future should be determined through the development plan process, where alternative options can be considered, and the involvement of the local community in producing a planning brief for the site.

It is disappointing that the opportunity for an imaginative mixed-use development in keeping with the urban grain of the area has not been taken.

Instead, what is proposed is an example of what CABE<sup>7</sup> calls a "model designed for out-of-town sites, with rectangular buildings, large car parks and constant delivery" ...being transported into an urban setting... "This leads to big standard blocks being built in small, irregularly shaped sites, and design which bears no relationship to the neighbourhood."

CABE identifies five principles of good supermarket design (page 7). Judging the proposed Sainsbury's superstore against these principles shows that it performs badly against the following:

- Relating the building to its neighbourhood

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<sup>7</sup> CABE (November 2010) "Supermarket-led Development: Asset or Liability"

- Creating good public realm and reducing car dependency
- Planning for the long term

Achieving BREEAM excellence means it does well against the “Achieving strong environmental credentials” principle. It also does well against the “Getting the housing right”.

## **F. Adverse Impact on food security and resilience**

Considering the issue of future food security, there is an argument that the current ‘supermarket business model’ is not sustainable and does not support the resilience of the food supply system. Bristol Partnership’s peak oil report<sup>8</sup> notes that “Bristol is part of a globalised food production and distribution system which is highly dependant on oil for industrialised agricultural methods and complex food chains” (page 39) and that “cheap supermarket food relies on access to diverse markets with cheap labour, centralised distribution and ‘just-in-time’ delivery models, all of which are threatened by peak oil” (page 39).

Resilience is built on diversity. This is threatened by the increasing domination of the food retail sector by the ‘Big Four’ (Tesco, Asda, Sainsbury and Morrisons) multiple food retail, both nationally and locally. In 2010 they had 76% of the national food market, compared to 63% in 1994. “Who Feeds Bristol”<sup>9</sup> and a range of other reports have documented a wide range of concerns about their expansion and increasing dominance of the market locally and nationally. “Who feeds Bristol?” report provides a good overview of the situation in Bristol and shows that Bristol overall has a relatively high density of stores owned by the ‘big four’ compared with other cities. For example in Bristol there is one Tesco per 18,900 people, compared to one per 38,100 in Leeds, one per 40,000 in Sheffield and one per 69,100 in Greater Manchester (page 23).

As well as the direct impact on local retailers by the loss of trade to large (often out-of-centre) superstores, there is the indirect impact on local suppliers and wholesalers. “Who Feeds Bristol?” (pages 36-40) identifies the increasing vulnerability of the Bristol Wholesale Fruit Centre at St Phillip’s and the negative consequences to independent retailers and caterers throughout Bristol and the sub-region if it was to close.

Thus further supermarket/superstore development such as the Sainsbury’s superstore proposal for the Memorial Stadium will further threaten the diversity of supply chains and thus the resilience of the local food supply system.

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<sup>8</sup> Bristol Partnership (October 2009) “Building a positive future for Bristol after Peak Oil”

<sup>9</sup> Joy Carey (March 2011) “Who Feeds Bristol” - [www.bristol.gov.uk/food](http://www.bristol.gov.uk/food)

## **G. Adverse impact on climate change (BCS13 and NPPF paras 17, 93, 94, 95, 96 & 99)**

The Climate Change Act 2008 sets a legally binding target of at least an 80% cut in greenhouse gas emissions by 2050 and a reduction in emissions of at least 34% by 2020 (against a 1990 baseline).

Bristol's Climate Change and Energy Security Framework (February 2010) aims to reduce Bristol's carbon emissions by 40% by 2020 (from a 2005 baseline) and by 80% by 2050. The framework was updated (March 2012) and includes the following broad strategic activities:

5. Create & implement a low carbon & energy resilient planning policy framework & development management process

10. Implement citywide travel & transport programmes, plan land use & deliver integrated, sustainable transport systems to reduce transport energy use & carbon emissions in Bristol

This is supported by Bristol Core Strategy policies BCS10 (transport and access improvements), Policy BCS13 (climate change), BCS14 (sustainable energy) and Policy BCS15 (sustainable design and construction).

There will be additional carbon emissions from the demolition and new construction and from the on-going operation of the store and the additional car trips, when the national and local targets are to reduce carbon emissions.

Notwithstanding the sustainability credentials of the building itself, there is an argument that the current 'supermarket business model' is not sustainable. For example the Bristol Partnership's peak oil report<sup>10</sup> states that:

"City planning policy also plays a part in food retail options. Bristol's food and convenience shopping is currently very car centric. Cars allow people to transport a large number of items and favour large retail outlets with abundant car parking facilities. The centralisation of convenience shopping has led to a situation where many areas of the city have very few local outlets from which to buy a healthy range of goods. A reduction in car travel is likely to increase demand for local retail space selling a wider variety of produce within walking distance from home or work." (page 43)

The proposal is a major development, which if built will be with us for at least the next 30-50 + years. A period for which there will be major, if not fundamental changes to meet climate change targets and develop resilience to the impact of peak oil and other resource shortages. It is thus important that it is designed to be flexible and adaptable for future use – rather than be demolished and replaced with a new building in, say, 20 years time.

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<sup>10</sup> Bristol Partnership (October 2009) "Building a positive future for Bristol after Peak Oil"

The proposal involves complete demolition of the existing stadium and new build of the store. It is unclear what will happen to the waste materials from the demolition and if they will be used in the new build.

The proposed development incorporates a range of good environmental features (sun pipes, rain-water harvesting, Bio-mass boiler) and the aim to achieve an excellent BREEAM rating and Code for Sustainable Housing level 4 is supported.

A significant potential benefit of the development is the reduced carbon footprint of the store resulting from the on-site renewable energy installations, and this is to be welcomed. However to realise this benefit in practice relies on, firstly, a third party ESCO operator coming forward with a viable scheme, and secondly, a genuinely sustainable source of biomass fuel to power the development. Since neither of these can be guaranteed by planning consent then only limited weight should be attached to them.

The proposal is car dependent and does not support active travel and sustainable modes of transport.

In terms of urban heat island effect it is disappointing that so much of the development will be hard development and car-parking, given there is the loss of the actual football pitch. The amount of impermeable surface increases the risk of flash-flooding. The opportunity to have a green roof to the superstore should be exploited, including its potential for some food production (eg bees, herbs).

The NPPF encourages the planning system to support the transition to a low carbon future in a changing climate (para 17). This development will lead to an increase in carbon emissions and thus should be refused.

### **3. HOUSING PROPOSALS**

The proposed housing development is of a good quality, other than it backs onto a superstore car park. It will meet minimum space standards, Lifetime Homes (Policy BCS18) and will achieve Code for Sustainable Homes Level 4 (BCS15). There is a good range of size and type (BCS18) and 40% will be affordable (BCS17). The 'home zone' design should keep car speeds reasonably low.

Areas where it could be improved are firstly the provision of play facilities. The proposed development includes family housing therefore safe access to play opportunities is needed. There is no on-site play provision proposed and the Bishopston, Cotham and Redland area green space plan (May 2010, pages 14–20) shows that both the access standards (450 m) and the quantity standards for Children's play space are not being met. Compared to the standard of 0.3 sq m per person, current provision in the area (0.22 sq m per person) is 73% of the standard. The access and quantity standards for formal green space are also not met.

Secondly, the amount of secure, convenient cycle storage is not clear. The minimum provision should be one cycle storage space per resident (adult and child), with additional cycle parking provision for visitors. It should be convenient to use so that

people do not have to wheel their bicycle through the house every time they want to use it.

If the development is to go ahead there will be an extra demand on local health services and thus it should be subject to a Section 106 agreement covering a financial contribution towards meeting the cost of these extra demands (policy BCS11).

In line with the protocol between Bristol City Council and NHS Bristol, this proposal has been run through the HUDU model to calculate the financial consequences of meeting the health needs of the residents of the new development. The total financial implications for NHS Bristol of this development is £489,584 of which NHS Bristol is requesting £101,795 (20.8%) to meet the additional capital costs, equivalent to £1,566 per dwelling (see Appendix 3).

There will also be issues of noise, air and light pollution that will need to be addressed to protect the amenity of local residents, including the use of conditions to limit opening hours and the times of deliveries and servicing.

#### **4. CONCLUSION**

The motivation for this application is not to meet unmet retail need in the area. There isn't any. It is to maximise funding for the relocation of Bristol Rovers, and possibly Bristol Rugby, to a new stadium on the UWE Frenchay campus.

The cost of achieving this, in terms of the adverse impact on a number of local centres in the area that serves the population of North Bristol, on local employment, on the local economy, on traffic congestion and promoting car dependency, the environment, greenhouse gas emissions and on patients and staff at Southmead Hospital is too great.

NHS Bristol has no objection to Bristol Rovers and Bristol Rugby relocating to a new and better stadium and redeveloping the site of their current stadium. However, that has to be for a use that is appropriate to the area, such as housing, education and B1 employment and including some open space to help meet the current deficit. This may or may not raise as much funding as retail development, but we need to look at the wider picture and Bristol Rovers and Bristol Rugby need to be realistic and match their ambitions to their resources.

If you require any further information or have any queries do not hesitate to contact myself or my colleague Stephen Hewitt.

Yours sincerely

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## Appendix 1. Health comments at Pre-app stage

As a 'super major' development a **health impact assessment (HIA)** is required, under Core Strategy Policy BCS21 and draft policy DM12 (March 2012). This can be part of the EIA if that is needed as well or incorporated into the Design and Access Statement. In essence, the HIA needs to answer three questions?

1. How does the development protect people's health and wellbeing?
2. How does the development create a healthy living environment to grow up and grow old in?
3. How does the development support people in making healthy choices and that makes these choices easier?

Specific issues that the HIA should address include:

- \* Physical activity
- \* Active travel and car dependency
- \* Landscaping and bio-diversity
- \* Access to affordable, safe and nutritious food, as against food that is highly processed and has high levels of fat, sugar and salt.
- \* Social capital and wellbeing
- \* Employment and the local economy
- \* Air quality
- \* Noise
- \* Environmental sustainability (climate change, resource depletion)
- \* The quality of the living environment of the new housing
- \* Health inequalities

There will also need to be a Section 106 contribution towards the cost to the NHS of meeting the health needs of the residents of the development.

"Supermarket-led development: asset or liability? (November 2010)", a CABI report has some good advice and identifies a number of principles of good supermarket design

It was requested that the scope of any **retail impact assessment** should cover:

### 1. Impact on access to affordable, safe and nutritious food

As well as the impact on the designated centres what will be the impact on the many small local parades and shops in North Bristol (eg Danby House (Lockleaze), Filton Avenue (Horfield), Southmead Road, Kellaway Avenue, Ashley Down Road)? We should include the impact on areas in South Gloucestershire as well.

For many people, particularly vulnerable groups such as mothers with young children, the elderly and others with restricted mobility these are important. In terms of provisions they provide more than just 'top-up' shopping, moreover these local facilities are also important in the social life of communities. If these local facilities close because of the loss of trade to the proposed superstore then there will be a reduction in access to food in these and other areas and subsequent implications for health inequalities based on both food access and social capital. It is also worth noting that access to small local parades and shops will more likely be by walking.

So the closure of a local shop could see short walking trips substituted by longer car-borne shopping trips.

## **2. Impact on local suppliers, the wholesale and support infrastructure**

As well as the direct impact on local retailers by the loss of trade, there is the indirect impact on local suppliers and wholesalers. “Who Feeds Bristol?” identifies the increasing vulnerability of the Bristol Wholesale Fruit Centre at St Phillip’s. The continuing expansion of the multiple retail food chains/superstores will lead to a tipping point when the wholesale market will become unviable, with serious consequences to independent retailers and caterers if it was to close - and to the local economy and local employment.

## **3. Impact on employment**

What will be the net impact on employment of the development - taking into account trade diversion, the consequential job loss elsewhere and relative efficiencies of different sizes and formats of stores?

The turnover per employee in a small convenience store is half that of a superstore.

People in employment are healthier, particularly those who have more control over their working conditions than those who are not. Employment is related to income and higher income is also linked to better health.

## **4. Retail expenditure and vacancy assumptions**

Many retail impact studies in the past have come to the conclusion that any impact will be insignificant as it masked by an assumption of growth in retail expenditure. This assumption no longer holds. Firstly because of the current national and international economic situation and long term implications and secondly. the growth in internet shopping.

Any study needs to look at the underlying vacancy rates on centres. Pop-up shops and galleries, charity shops and other uses can mask true vacancy rates and give a superficial impression of the vitality and viability of centres that can actually be quite vulnerable.

Local centres are important for social interaction, social life and social capital of an area. If these decline there are health risks through isolation and impacts on mental health and wellbeing.

## **Appendix 2. Employment Impacts of the Sainsbury's superstore**

Data taken from Sainsbury's planning application:

Turnover of the store: £49.0 million at 2010 prices (Retail Statement page 37)

Employment of the store: up to 350 jobs (up to 245 fulltime jobs, up to 105 part time jobs (Economic Statement page 20)

Turnover per job: £49 million/350 = £140,000

The House of Commons All-Party Parliamentary Small Shops Group report "High Street Britain: 2015" (2006) states that:

"In 2004, the convenience store sector accounted for over 500,000 employees from a turnover of around £21bn. By comparison, the Big Four superstores employed 800,000 people against a turnover of around £76bn. This equates to £42,000 (£50,400 – 2010 prices) turnover per member of staff in the convenience store sector, versus £95,000 (£114,000 – 2010 prices) turnover per member of staff in superstores." (pp 11-12).

Trade diversion figures are taken from Figure 5.5 (Retail Statement page 55)

### **A. Using turnover per job figures from House of Commons Report, up-rated to 2010 prices.**

Loss inside Primary Catchment Area (PCA) – small stores

£10.4 million/£50,400 = 208 jobs

(Existing shops on Gloucester Road 58 jobs lost, Whiteladies Road 82 jobs lost)

Loss inside PCA – big stores

£24.4 million/£114,000 = 214 jobs lost

Loss outside of PCA

£14.2 million/£114,000 = 125 jobs lost

**TOTAL JOBS LOST = 547**

**NET JOBS LOST = 547 – 350 = 197**

### **B. Assuming that the other big stores have the same level of efficiency as the proposed Sainsbury's store**

Loss inside PCA – small stores

£10.4 million/£50,400 = 208 jobs

(Existing shops on Gloucester Road 58 jobs lost, Whiteladies Road 82 jobs lost)

Loss inside PCA – big stores

£24.4 million/£140,000 = 174

Loss outside of PCA

12/02090/F – October 2012

Bristol Rugby Football Club, Memorial Stadium. Filton Avenue, Bristol BS7 0AQ

£14.2 million/£140,000 = 101

TOTAL JOBS LOST = 483

**NET JOBS LOST = 483 – 350 = 133**

### **Appendix 3. Financial consequences for the NHS of the health needs of the residents of new development**



The adopted Bristol Development Framework Core Strategy (June 2011) Policy BCS11 covers infrastructure and developer contributions and explicitly refers to healthcare and social care facilities.

It is important that the costs of providing necessary service infrastructure and revenue be built in to the development process. In line with the protocol with Bristol City Council, we have used the HUDU (Healthy Urban Development Unit) model to calculate the financial consequences of the health needs of the residents of the new development. The model calculates the number of net new residents to avoid double-counting requirements from the existing population.

For the Memorial Stadium proposal that includes 65 new dwellings (39 (60%) market, 19 (29%) social rented and 7 (11%) intermediate) the estimated net population gain is 113, out of an estimate total number of 139 residents.

The total financial requirement estimated using the HUDU model is a one-off sum of £489,584 (£7,532 per dwelling). This breaks down to £101,795 capital (£1,566 per dwelling) and £489,584 revenue (£5,966 per dwelling).

The capital costs breakdown to:

|                          |         |
|--------------------------|---------|
| GP and primary care      | £28,165 |
| Intermediate health care | £1,710  |
| Mental health            | £10,394 |
| Acute healthcare         | £61,526 |

The revenue costs cover the time lag between the new population arrival and their inclusion in the in the Department of Health per capita based funding allocation to NHS Bristol.

The total financial implications for NHS Bristol of this development is £489,584 of which NHS Bristol is are requesting £101,795 (20.8%) to meet the additional capital costs

Inevitably there are a number of assumptions that underlie these calculations, and by varying the assumptions slightly different estimates can be arrived at. Nevertheless this gives a good idea of the order of extra demands (and the associated costs) to the NHS of the proposed development.

#### **Conclusion**

The application for 65 dwellings on the site of the Memorial Stadium (12/02090/F) should be subject to a Section 106 agreement covering a financial contribution of £101,795 (£1,566 per dwelling) towards the extra capital demands on health services of the development, in line with Core Strategy Policy BCS11 (June 2011) out of a total extra demand of £489,584.