

KNOWLE DESERVES BETTER – TOO HIGH, TOO DENSE

12 Storeys

800+ Flats

2000+ Residents



KNOWLE NEIGHBOURHOOD PLANNING GROUP - Our response to ‘Redcatch Quarter’ Outline Planning Application.

**Submitted to Bristol City Council
December 22nd 2022.**



OBJECTION TO REDCATCH QUARTER PROPOSAL – KNOWLE NEIGHBOURHOOD PLANING GROUP (KNPG).

Knowle Neighbourhood Planning Group (KNPG) OBJECTS to the Outline Planning Application Ref No 22/03924/p (called Recatch Quarter).

KNPG is the local neighbourhood planning forum for Knowle and a member of the Bristol Neighbourhood Planning Network (NPN). Our response and objections are informed by the views of local residents and stakeholders, including from those attending 2 public meetings that we held in September 2022.

KNPG reserve the right to make additional comments before the final deadline – yet to be announced by Bristol City Council. We submit this in late Dec 2022 to give a clear indication of our most significant objections listed 1-14 below.

KNPG supports the redevelopment of the Broadwalk site and provision of homes on it - particularly affordable ones that will benefit local people.

KNPG supports blocks of flats up to 6 storeys high for a range of reasons. This includes evidence that shows higher blocks do not support a good quality of life for residents, with above-average incidents of poor mental health, anti-social behaviour, and children not fulfilling their potential. There is also evidence that buildings over 6 storeys are much less energy efficient, both to build (embodied carbon) and to run (operational carbon).

KNPG welcomes and supports the regeneration of the shopping centre and Knowle as a designated Town Centre – and the investment it will bring to the area.

However, there are a number of significant objections to this application.

A summary of the key objections from KNPG are listed below: -

1. Knowle is one of two designated ‘Town Centres’ in South Bristol, and it’s “vitality and viability” is being undermined.

- The NPPF clearly states that “*development should not undermine the vitality and viability of town centres*” when repurposing retail land for homes.
- The Redcatch Quarter proposals significantly undermine Knowle Town Centre’s ‘vitality and viability’ because
 - Square footage of retail and community space is reduced by 57%.
 - Community space is reduced by 63%
 - Leisure space by 100%.
 - Office space appears to also be completely lost

- This also contradicts with Site Allocations DPD-BM7 and DPD BM8 which state “*proposals involving the loss of community facilities, land or buildings will not be permitted*”. Policy provides criteria for loss but needs to ensure provision is local or on-site.
- Core Strategy BCS7 Retail Centres and BCS12 calls for the “*provision of good quality, accessible community infrastructure*” and that “*existing community facilities and services are retained.*”

Similarly, BCS1 sets out that “*60,000m² of net additional office floorspace focussed on centres*” is needed in South Bristol,

Retention of community and leisure space is needed rather than it being decreased. – and it is counterproductive to lose the 2,400m² of office space that is currently available at Broadwalk.

- There will be an additional 2000+ new residents in Knowle in the 817-850 flats, adding to the need for a thriving shopping centre.
- People from Filwood, Hengrove, Stockwood (and to a lesser degree Brislington and Totterdown) use Broadwalk as their main bus accessible shopping centre with a supermarket (Iceland) and value retailers (B&M, Poundland) in it.

So, this impacts on far more people than just those who live in Knowle.

2. Residential density in Redcatch Quarter is too high – too many people in this small a space is called ‘hyperdensity’

- Broadwalk sits in the ‘Inner urban’ area of the Urban Living SPD’s ‘Bristol Density Setting Map’. It recommends an ‘optimum density of **120 DPH** (Dwellings per Hectare)’ for Knowle.

Cramming the 817 dwellings into the 2.2-hectare footprint of the Broadwalk site equates to **428 DPH** when the Maccreeanor-Lavington method is applied. Parking and shopping/town centre uses are also in this 2.2 hectares.

This is 257% greater than the 120 DPH ‘optimal density’ recommended by the Council. It is 611% more dense than the existing neighbourhood

- 428 DPH is also 22% higher than the hyper-density threshold of 350 DPH recommended by the report ‘*Superdensity: The Sequel*’.

In this report, experts recommend an ‘**assumption against development for schemes above 350 DPH, even in central London**’ as quoted below.

“Hyperdensity’ should be resisted, and that there should be a presumption against ‘hyperdense’ developments over 350 homes per hectare, which should be confined to exceptional locations and subject to exceptional justification.” Ref: Superdensity - The Sequel’ (Pollard, Thomas, Edwards 2015).

KNPG is aware that if the *Superdensity* report’s guidelines are followed, Redcatch Quarter would be under intense scrutiny with a view to being rejected even in central London. Knowle Deserves Better.

- The proposed 12, 10 and 8 storey towers do not support Core Strategy BCS21 that calls for *“development to safeguard the amenity of existing development and create a high-quality environment for future occupiers”*
- It also goes against the principle of the *Site Allocations Development Plan Documents (DPD) DM 26 – Local Character and distinctiveness*. The massing and density are in stark contrast to the 2 and 3 storey Victorian, Edwardian and 1930 homes surrounding Broadwalk.

3. 10 and 12 storey tower blocks mean a significant loss of light, privacy and shadows cast in the nearby area.

- The Urban Living SPD’s Q3.1 states that

“tall buildings will generally be discouraged on physically constrained sites within existing built-up areas, where a tall building is likely to have a negative impact on the daylight and sunlight penetration into the habitable rooms of existing buildings, or onto well used parts of the public realm.”

- There will be significant loss of light, privacy and casting of shadows over Redcatch Park and the Cricket Grounds and in many nearby roads - notably on the main Wells Rd, Broadwalk Rd, Ryde Road, Redcatch Rd and Hengrove Rd.
- The intense density at Redcatch Quarter does not allow sufficient “stepping up” in the height of the buildings.

The existing 2-storey houses on Ryde Road and Broadwalk will be within just a few meters of sheer 8 storey facades.

Many of the windows in the proposed development will directly overlook bedrooms and living areas in Ryde Road, Redcatch Road and Broadwalk

- The increased density and height of the proposed buildings will cast a larger shadow over the generality of Redcatch Park.

It appears the easterly boundary of the park will not have direct sunlight until after 9am, even on midsummer’s day.

- The blocks also all fail the visual and environmental tests in Part 3 of the Bristol Urban Living SPD, 2019.
- The tall buildings will have a negative impact on the surrounding area adversely affecting the character of Knowle as a suburb of mainly 2 and 3 storey Victorian, Edwardian and 1930s houses
- The developers have repeatedly refused public requests to provide shadow maps and/or CAD models of the proposed scheme.

Consequently, residents and KNPG have not been able to scrutinise the light and shadow implications of the build in the detail needed.

4. The 12,10 and 8 storey blocks fail to provide the ‘high quality environment’ for residents that ‘safeguards the amenity’ that Bristol’s policy guidance calls for (Core Strategy BCS21).

- The negative impacts of these higher blocks are extensively listed in Part 3 of the Bristol Urban Living SPD.
- Tall tower blocks over 6 stories high do not support a good quality of life for residents, with above-average incidents of poor mental health, anti-social behaviour, and children not fulfilling their potential – as referenced in Create Streets.
<https://www.createstreets.com/front-page-2/about-us/cs-foundation>
- KNPG is seriously concerned for its future residents living in flats with a residential density of 428 DPH as

“at densities above 350 DPH, and even with the best practice approach we advocate, it feels very unlikely that we can create the conditions that allow mixed communities to thrive”. Ref: Superdensity – the Sequel, Pollard, Thomas, Edwards 2015. Chapter 3.

http://www.pollardthomasedwards.co.uk/download/SUPERDENSITY_2015_download.pdf

5. KNPG supports the provision of housing on the Broadwalk site and flats in blocks. However, these should be 6 storeys and under to ensure a thriving community.

- Evidence identifies that buildings over 6 storeys are much less energy efficient, both to build (embodied carbon) and to run (operational carbon). Ref: High Density, Low Rise, Zero Carbon, Andy McIntosh, London Festival of Architecture, 2021.
<http://2021.londonfestivalofarchitecture.org/blog-post/high-density-low-rise-zero-carbon/>

- Lower blocks can still provide high densities of residents per hectare whilst enabling more cohesive communities and much improved lived experience and life outcomes for residents.

“Apartment blocks of between five and eight storeys, including family apartments and duplexes, create successful homes and neighbourhoods at surprisingly high densities” Ref: Superdensity Report quoted in Bristol Urban Living SPD, 2019

KNPG asserts that to meet BCS21 and remain in line with the Urban Living SPD’s recommendations for Knowle, the scheme should be capped at 6 storeys, and 120 DPH. Knowle Deserves Better.

6. Only 7% of the new development is affordable. Bristol City Council’s own Affordable Housing policy calls for 30%

Ref: Bristol Core Strategy (BCS) 17’s Affordable Housing Policy’s 30% target for residential developments of 15+ dwellings

- Of the 817 – 850 proposed units, 42.5% will be Build-to-Rent units that are rented in perpetuity, often at higher rent rates.

The developer’s want to sell/rent these units at prices 15% higher than Knowle’s current market prices saying

“there is an argument that £475 per sq ft is too ambitious at this stage but we are optimistic that the scheme can set a new benchmark for the Knowle area”.

Inflating local rent and house prices will worsen the housing crisis.

- The Developers have indicated to KNPG that the affordable housing would be in block E (Social Housing) and block H (Shared Ownership). These blocks are likely to be dominated by ‘1 bed 1 person’ or ‘1 bed 2 people’ units. This suggests the proposed affordable units will be amongst the smallest within the proposed development.
- KNPG supports the provision of affordable housing on the Broadwalk site. We believe the proposed 7% provision is so far short of the Bristol policy that a new plan should be submitted that addresses this with a wider range of accommodation being affordable. Knowle Deserves Better.

7. **There are insufficient parking spaces for residents and visitors. The 0.25 car parking spaces/dwelling cannot be reconciled with the 'City Council Parking Standard' or local and national practice (0.7-1.1 ratios) and despite the developer's statement to justify their position (as required when low parking space ratios are proposed).**

More resident and commercial paces are needed to avoid the inevitable parking problems, congestion, road safety and access issues that will ensue.

- The 210 resident car parking spaces is 0.25 car parking spaces per dwelling.

That is just 23% of the Bristol City Parking Standard that seeks a maximum 922 car parking spaces for Redcatch Quarter residents.

- 0.25 residential car parking spaces/dwelling is one of the lowest resident parking space ratios of a new development within a few miles of Broadwalk in recent years.

This includes the Paintworks in Bristol that has residential car parking ratios of 1.1 and 0.8 per dwelling.

A residential car parking space ratio of 0.8 for Redcatch Quarter would mean over 600 car parking spaces are needed (not the 210 proposed).

- The developers identify 11 comparable sites nationally. The residential car parking ratio of these is 0.732 car space/dwelling

A residential car parking ratio of 0.732 is again over 600 car parking spaces for the 817-850 homes at Redcatch Quarter.

- The developers quote that 56.8% of Knowle residents travel to work by car and 77.7 % own 1 or more vehicles.

The developers do not estimate how many cars are likely to be owned by the new residents of Redcatch Quarter but this data suggests 600+ additional vehicles. This is far more than the 210 parking spaces proposed.

Provision of just 210 car parking spaces means significant additional parking on nearby residential streets – bringing with it congestion, overcrowding, road safety, parking and access issues for all.

- Just 98 paying public car parking spaces are proposed for shoppers, visitors, staff etc.

This is 41% of the maximum total that Bristol standard sets.

This is too low considering that Broadwalk serves South Bristol communities that aren't on direct bus routes to Knowle.

The proposals will increase the amount of post-5pm custom with increased food/beverage provision at the same time as cuts to south Bristol's bus services. This means that customers will have no choice other than to drive if they wish to visit in the evening

- The Council asks developers to justify much lower parking ratios than their policy.

The developers say their low residential car parking ratio of 0.247 car parking spaces/dwelling (and 210 spaces and 23% of the Bristol Parking Standard) is due to their expectations of the likely number of trips to be made (persons and cars) at various times in the day.

KNPG do not accept this especially in the light of facts stated by the developers above and Bristol's own standards.

- A local RPZ (Residents Parking Zone) is proposed to help with the residential parking problems that will ensue.

However, despite being funded and welcomed by many, an RPZ is unlikely to go forward without additional significant public support once the flats are built.

Currently the Mayor is opposed to all RPZs and only one has been allowed in the last 6 years - after a huge public campaign once homes were built.

It is also the case that RPZs can often push the problem elsewhere and reduce street car parking for local facilities with little or no car parking space of their own.

8. The Redcatch Quarter Transport Plan relies on yet to be agreed improvements to public transport and bus services

- BCS1 highlights the need for *“major improvements to transport infrastructure... to enhance links between South Bristol (and) the city centre... with an emphasis on pedestrian, cycling and public transport”*.

Many of the needs identified in BCS1 are yet to come to fruition, particularly the *“extended showcase bus corridors on the A37”*.

- This A37 Travel Strategy is still in development, yet the Redcatch Quarter Transport Plan appears to be reliant on changes to the No 2 bus route yet to be agreed.

It comes at a time when existing bus routes are struggling and a further 2000+ residents are proposed, some of which are later-living residents.

- In reality, this mixed-use scheme that could add much more stress to the public transport network, before actual improvements are defined by BCC and WECA, far less implemented.

9. Local Health and Care facilities are already at breaking point. More pressure will put the health and wellbeing of people in Knowle at further risk.

- Waiting times at Priory surgery are already at an all-time high.
- My Dentist has closed its NHS list with no plans to reopen it.
- People fear that adding 2000+ new residents to their books will break these health services.
- Although school and nursery spaces are currently keeping pace with demand, this may be very different in the future.

10. Redcatch Quarter does not contribute positively to the city and local sky line.

- The site is not strategically identified in the local plan or site allocation map for tall buildings,
- The Redcatch tower blocks will overtake Knowle's Grade II listed Water Tower as the highest point in South Bristol, impacting on views across the city.
- The proposed 10 and 12 storey blocks are located at the top of one tallest points in S Bristol. They will not contribute to a Bristol cohesive sky line.

11. Outside space for the 85 children forecasted to live at Redcatch Quarter appears insufficient to Council guidance.

- The Urban Living SPD's guidelines show that Redcatch Quarter should contain 4,491m² of private open space, plus 852m² of play space. A minimum of 523m² of this play space should be onsite.

There does not appear to be enough private outdoor space on site to meet these requirements. The submitted 'Open Space Assessment' does not address this. Rather it assesses the scheme's compliance with Appendix 1 of the Site allocations and Development Management Policies (SADMP).

- 85 children are forecast to live on site at Redcatch Quarter.

This means that a percentage of the 2 bedroom apartments should have at least 6-7m² of *“directly accessible private outdoor space”* to meet the Urban Living SPD’s requirement for *“all family units... (to) mimic the qualities of a traditional family garden”*.

The proposed apartment layouts on page 99 of the Design and Access Statement (Part 3) show zero 2-bed apartments with a balcony. Therefore (in the absence of reserved matters) it currently appears that the scheme is unlikely to meet the Urban Living SPD’s requirement for direct outside access from the family units.

12. Open and Green Spaces are compromised by Redcatch Quarter

- Core policy BCS9 states that *“open spaces which are important for recreation, leisure and community use, townscape and landscape quality and visual amenity will be protected”*.

Claims that Redcatch Park is underutilised have been articulately debunked by the Friends of Redcatch Park’s objection to the scheme.

Overcrowding of Redcatch Park is a risk from Redcatch Quarter where there is insufficient space green and open space for residents of their own built into the design.

- The current facade facing Redcatch Park is neutral, disguised by the trees and at a low level, it benefits from minimising, if not eliminating, overlooking of the park.

Replacing this with sheer walls of residential facades causes a significant reduction in the visual amenity of Redcatch Park. This significant overlooking reduces the amenity of the park to those who value it as a place of tranquillity and serenity.

- Overcrowding of Redcatch Park is a risk with new residents from Redcatch Quarter who do not have access to sufficient green and open space of their own.

13. Closure, demolition and rebuild of the site will take up to 6 years with shops closing in the interim – impacting all who use them and in particular non-drivers in Knowle and nearby areas that use bus routes to Broadwalk (e.g. Stockwood).

- The demolition plan indicates whole demolition in Phase 1, and retail units blocks built in Phase 2 (blocks E-I) and Phase 3 (blocks C-D). This could

leave Knowle without a significant proportion of its shops and facilities (including pharmacy services) for up to 6 years.

- We do not know the impact this will have on the viability of the nearby Post Office and Bank as well as shops and services not subject to demolition over these years.
- Shops will close or relocate. The developers do not yet have a 'retail strategy' and describe their approach as 'letting the market decide' when units are eventually available, so no continuity is proposed for local traders.
- KNPG understand temporary homes will aim to be found for the Library and Dentists.
- KNPG understands the developers would like a small supermarket to be part of the new shops and believe that is essential going forward.

14. The 2018 permission should not set a precedent for this scheme in KNPGs view. It is misleading to reference it.

- There is little continuity and overlap between the current application and the agreed one despite the repeated cross references made by the developers.

The 2018 scheme is a Shopping Centre regeneration with a mix of building heights and 420 flats. This 2022 application is for a full site demolition, a significant housing development of up to 817-850 flats and a much reduced retail space.

It has changed from a town centre regeneration supported by residential units, to a residential scheme with a much-reduced volume of town centre uses.

- Weaknesses in the 2018 scheme are compounded.

There is a spread of 12 storey towers to a higher proportion of the site with a residential density to 428 DPH, even further above the 350 DPH hyperdensity threshold.

Affordable housing drops from 13% to just 7%.

It reduces residential and commercial parking and poses a 100% reduction in leisure uses on site.

- KNPG also notes that at the time of consideration of the agreed 2018 application, Bristol had not published and committed to its Urban Living SPD in 2019.

This further weakens the relationship of this 2022 application with the previous agreement in 2018.

15. IN SUMMARY AND CONCLUSION, KNPG OBJECTS TO THE OUTLINE PLANNING APPLICATIONS BECAUSE: -

- **The ‘vitality and viability’ of Knowle as a designated town centre is undermined and against City Council policy**

The NPFF states *“development should not undermine the vitality and viability of town centres”*.

Reductions in square footage of Retail space (57%), Community space (63%), Leisure space (100%) and Office space (completely lost) is against the Site Allocations DPD-BM7 and DPD BM8 and Core Strategy BCS7 Retail Centres and BCS12

- **Residential Density is too high** at 428 DPH (dwellings per hectare) is way beyond the 120 DPH identified as appropriate for Knowle by the Bristol Urban: Living SPD, 2019. This is 257% greater than is recommended by the Council. It is 611% more dense than the existing neighbourhood. This level of residential density is called ‘hyperdensity’ and would be under intense scrutiny with a view to being rejected even in central London.
- **Massing and Residential Density is not in keeping locally with the 2 and 3 storeys Victorian, Edwardian and 1930 homes around Broadwalk.** It goes against the principle of the Site Allocations Development Plan Documents (DPD) DM 26 – Local Character and distinctiveness.
- **Contrary to Bristol’s policy a poor-quality environment is created in the 8,10 and 12 storey towers.** Core Strategy BCS21 calls for *“development to safeguard the amenity of existing development and create a high-quality environment for future occupiers”*.

KNPG asserts that to meet BCS21 and remain in line with the Urban Living SPD’s recommendations for Knowle, the scheme should be capped at 6 storeys, and the 120 DPH that the city guidance seeks.

- **There will be significant loss of light, privacy and shadow in local roads and local green spaces** in direct contradiction of the Bristol Urban Living SPD’s Q3.1 that states

“Tall buildings will generally be discouraged on physically constrained sites within existing built-up areas, where a tall building is likely to have a negative impact on the daylight and sunlight penetration into the habitable rooms of existing buildings, or onto well used parts of the public realm.”

This particularly affects Recatch Park, the Cricket Club, the Wells Rd, Broadwalk Rd, Ryde Road, Redcatch Rd and Hengrove Rd.

- **A lack of affordable homes contradicting Bristol Council's own Affordable Housing policy** that calls for 30% of the development to be affordable – this is only 7%.
- **Car Parking ratios are not within City Council standards, local or national practice.** The current application cannot be reconciled with the 'City Council Parking Standard' or practice - even when considering the developer's statement to justify their very low residential car parking ratio of 0.25 (as required by the Council).

The proposals of resident car parking ratio/dwelling of just under 0.25 is out with the national comparators stated by the developers of 0.732 and local practice. For example, at the Paintworks there is a parking ratio of 1.1 and 0.8 (and a Residents Parking Zone).

More resident and commercial places are needed to avoid the inevitable parking problems, congestion, the road safety and access issues that will ensue locally.

- **The Redcatch Quarter Transport Plan relies on yet to be agreed improvements to public transport and bus services** (A37 Travel Strategy). It comes at a time when existing bus routes are struggling and this mixed-use scheme that could add much more stress to the public transport network, before actual improvements are defined by BCC and WECA, far less implemented.
- **Redcatch Quarter does not contribute positively to the city and local sky line** – and Knowle is not strategically identified in the local plan or site allocation map for tall buildings,
- **Local Health and Care facilities are already at breaking point. More pressure will put the health and wellbeing of residents in Knowle at further risk.**

- **Outside space for the 85 children forecasted to live at Redcatch Quarter appears insufficient to Council guidance** (Urban Living SPD, 2019).
- **Open and Green Spaces alongside Redcatch Quarter are compromised despite Council policy stating** *“open spaces which are important for recreation, leisure and community use, townscape and landscape quality and visual amenity will be protected”*. Core policy BCS9.
- **Closure, demolition and rebuild of the site will take up to 6 years with shops closing in the interim** – impacting all who use them. In particular it will affect non-drivers in Knowle and nearby areas that use bus routes to Broadwalk (e.g., Stockwood). There is no assessment of the impact this will have on the viability of other nearby Post Office, Bank, shops, cafes and services not subject to demolition over these years.
- **The 2018 permission should not set a precedent for this scheme and it is misleading for developers to reference it.** There is little continuity and overlap between the current application and the agreed one. It has changed from a town centre regeneration supported by residential units, to a residential scheme with a much-reduced volume of town centre uses. The 2018 scheme is a Shopping Centre regeneration with a mix of building heights and 420 flats. This 2022 application is for a full site demolition, a significant housing development of up to 817-850 flats and a much reduced retail space.

KNPG also notes that at the time of consideration of the agreed 2018 application, Bristol had not published and committed to its Urban Living SPD in 2019. This further weakens the relationship of this 2022 application with the previous agreement in 2018.

21st December 2022.