



an independent force for a **better Bristol**

**Response to WoE Joint Spatial Plan “Towards the Emerging Spatial Strategy”
consultation – November/December 2016**

The Society welcomes the opportunity to respond to the second round of consultation on the WoE Joint Spatial Plan. We make some general comments below, and then answer the consultation questions.

Summary of our comments

We very much applaud the joint working of the four local authorities – the first sub-region to do a statutory planning document. It is very encouraging to see the evidence of the officers from different local authorities working together. We support much of the plan, whilst challenging the choice of scenarios and some of the development location proposals.

Choice of scenarios: our main challenge to the proposals is that the two scenarios selected - transport-focused, protection of the green belt – are not compatible. As the green belt covers such a large part of the sub-region, choosing development locations outside the green belt is likely to lead to greater transport costs. We would favour a scenario which follows the transport-focused approach more than the proposals presented in this consultation. Given the high projected expenditure on transport infrastructure, it is right to challenge whether a different choice of locations could reduce the expenditure needed.

The compromise between the two scenarios has been presented like a firm decision arising from the first round of consultation: for instance, the slide presentation launches straight into the transport proposals before addressing the spatial choices. The adoption of these two scenarios may have followed from the first round of consultation, but we think it is wrong to put forward a single proposal that is a compromise between the two. At this stage of the consultation process, two or three options could have been presented, including one which followed the transport-focused approach more than the proposals presented in this consultation. The 2 or 3 options could have been presented alongside each other, showing the benefits and costs of each option, with the costs being both the capital costs and the ongoing environmental costs, including carbon emissions. **The choices of development location should be evidence-based, and the key evidence should be presented upfront, not just in technical documents which are hard to navigate.**

Approach to the green belt: a sustainable approach must take more seriously a possible review of the green belt. We urge the authorities to consider “green belt swaps”, an approach being considered elsewhere in the country which would meet the twin objectives of reducing travel and of protecting the green belt. This is where development on accessible green belt land is permitted provided that similarly sized areas of green belt are created

elsewhere. This would surely allow more sustainable development adjacent to the main urban areas rather than in remote locations beyond the outer boundaries of the current green belt.

Erroneous thinking to justify road building: the proposed development location at Banwell/Churchill is justified on the basis it will help the case for road improvements in the area, including the A38 corridor into Bristol, which seems back-to-front erroneous thinking. This location does not make good use of existing public transport connections, and will add private motor traffic.

We support in particular:

- urban living – maximising the potential of urban land for homes. This includes 12000 homes in Bristol, to be confirmed by more detailed work and incorporated in the Local Plan, in addition to 21000 already planned and forecast. Some of this 12000 comes from innovative re-allocation of existing land use, which we support. We also support Bristol Council’s planned guide for the design of higher density development in the city.
- “transport-focused development” – many of the proposed development locations are consistent with this approach, with new housing in existing urban centres and settlements, and on transport corridors.
- a recognition of:
 - the primary role of walking, cycling and public transport within the urban areas
 - the need to reduce traffic coming into Bristol city centre, using a ring of Park & Rides
 - the re-allocation of road space to better promote sustainable travel choices on radial routes, potentially facilitated by improvements to orbital highway capacity in certain locations.
- the planned work to develop “place-making principles to maintain and enhance our built and natural legacy”. The work can draw on best practice principles, eg permeability of walking and cycling routes, minimum distance from homes to green space, referring to guidance such as DfT’s *Manual for Streets* and *Street Design for All*, and Natural England’s *Accessible Natural Green Space Standard*. This can be complemented by plans at local authority level, which respond to local context and heritage assets.
- realism about affordable housing: “it is unrealistic and unsustainable for the Plan alone to meet the full amount of affordable housing identified.” We agree that the demand cannot be met through the planning process alone.

Employment in South Bristol

We note that the Economic Development Needs Assessment (EDNA) includes under “Implications for Spatial Planning Policies” (Exec Summary 11.1/8.26 of full document):

“To address relative deprivation and market failure in South Bristol, development schemes (infrastructure, housing and employment) within South Bristol and its fringe could be pursued. This could help challenge the status quo, create a virtuous cycle of investment and stimulate demand for employment uses, thereby helping to create jobs and addressing relative deprivation.”

... and

“2.123. South Bristol is an area where there is an aspiration to stimulate commercial demand to create jobs and address relative deprivation. In conclusion the policy review highlights the necessity for the four West of England UAs to work closely and effectively together if the economic potential of the area is to be fully realised.”

We are therefore surprised that the draft JSP includes ...

“no new major employment allocations ... at this time. Local Plans will need to consider further any employment provision required in association with new strategic housing as well as policies to address any localized mismatches between the supply and demand for different types of employment provision. This will make an important contribution in ensuring an appropriate range and balance of employment land particularly where new strategic growth is being identified as part of mixed and balanced communities.”

Development locations

We accept that the choice of development locations is based on a number of factors (landscape, heritage, ecology, transport, flood risk, Green Belt), and balancing these factors can never be totally objective.

Bristol's edges

Urban extensions are potentially more sustainable than other locations, because transport links are shorter and infrastructure nearer. However, we accept the arguments for not building out further to the **east** and to the **north**, in order not to increase 'sprawl' and because of poor connectivity between east Bristol and the city centre. Nor are extensions to the **west** or **north-west** appropriate.

We believe however that urban extensions are appropriate on the **south-west** edge of Bristol (Ashton Vale – contra the JSP proposals, but accepted by Bristol Council), particularly to the east of the new MetroBus/South Bristol Link route, based on the JSP's own assessment of the area, including comments in the Transport topic paper. We do however, accept the proposal for a **south-east** extension at Whitchurch, despite the need for new transport infrastructure.

Outside Bristol

- we challenge the chosen locations of **Charfield, Buckover**, since they are not transport-led. Wickwar seems preferable to Charfield, already having its own train station.
- we think SW Bristol would be a better choice of location than **SW Nailsea** (for which the Transport topic paper lists the connectivity challenges) and **SW Backwell**, because both will generate more car traffic.

Transport mitigation

We think that the £1.8bn of expenditure to mitigate the effect of new development should be broken down between development locations, so that it is possible to see which development locations are generating the expenditure. Given the high projected expenditure on transport infrastructure, it is right to challenge whether a different choice of locations could reduce the expenditure needed.

Consultation Questions

Q1 Does the proposed strategy make adequate provision to address the housing needs of the West of England?
A1 We have no reason to doubt the housing need projections.

Q2 How can we increase the delivery of homes, in particular much needed affordable homes in the West of England?

A2 We agree that the demand cannot be met through the planning process alone. Other national and local

government initiatives are needed.

Q3 Does the proposed strategy make adequate provision to address the economic and employment needs of the West of England?

A3 See our comments above on South Bristol

Q4 Does the Preferred Spatial Strategy and the locations identified meet the plan's strategic priorities and vision?

A4 See our comments above. The transport-focused approach and protection of the green belt are not compatible.

Q5 Are there any reasons why this strategy or identified locations could not be delivered?

A5 The likely barriers are cross-boundary political co-operation, funding, and capacity to deliver complex projects. It will be vital that, as promised in the Transport topic paper, "the councils will carefully plan how to ensure that investment programmes are prioritised, so that new development locations come forward at the same time as the transport schemes which help to address their impacts on the network".

Q6 Is the Preferred Spatial Strategy the most appropriate strategy, when considered against the reasonable alternatives?

A6 See our comments above. Given the high projected expenditure on transport infrastructure, it is right to challenge whether a different choice of locations could reduce the expenditure needed.