



an independent force for a **better Bristol**

**Response to WoE Joint Spatial Plan Issues and Options consultation – November 2015 to January 2016**

The Society welcomes the opportunity to respond to the consultation on the WoE Joint Spatial Plan. We recognise that the Issues and Options paper is an early stage in the plan process. We make some general comments below, and then answer the consultation questions.

**Overall approach**

No single scenario is likely to provide the additional accommodation needed. The Society suggests that scenarios 2 (Bristol-focused), 3 (Transport-focused) and 4 (other towns) should in some combination determine the choice of location of new development. If new development is focused away from Bristol, outside the Green Belt and in places without good transport links, then it will be difficult to achieve the JSP's vision of "Patterns of development and transport will facilitate healthy and sustainable lifestyles."

The **Bristol focus** is appropriate because Bristol (including the part of Bristol in South Gloucestershire) is the engine of economic and demographic expansion in the West of England, and the majority of the anticipated increase of population will be economically dependent on the Bristol built-up area. Bristol also includes much of the retail, entertainment and social destinations of the West of England.

The Society proposes that the West of England local authorities use the following **sequential test** to establish the priority order of locations:

Accessibility	an assessment of the proximity of employment to the new development, the new development's access to public transport and the capacity of the local road network to absorb the traffic that the new development would generate.
Infrastructure	an assessment of the local educational, medical, social, recreational and convenience retail resources (soft infrastructure) and the ability of the new development to build or improve the local soft infrastructure to meet the reasonable needs for the future.
Townscape/landscape	The impact on landscape, reviewing the quality of any area of the existing green belt particularly where it separates built-up areas. The ability of the new development to improve the local setting through a landscape scheme to mitigate the impact of development to create a sense of place.
Housing	The housing density and mix achievable in the development location, and the local housing market demand.

**Green belt** – we are in favour of a review of the green belt, and we reject Scenario 1. When an 18% increase in housing is required and the green belt accounts for 48% of the plan area, it is unrealistic to hold unquestioningly to the existing green belt area. The countryside at the outer boundaries of the green belt does not necessarily deserve more protection than land just beyond. The green belt has been a useful planning tool to prevent urban sprawl, but it is too blunt a tool in the current situation where so much growth needs to be accommodated over the plan period. Preventing countryside encroachment has to be balanced against providing housing in sustainable locations.

We must not rule out possible urban extensions for Bristol, as long as green ‘wedges’ are retained to link up with the existing green infrastructure in Bristol. Expansion along the rail corridors east, south-west, north, and north-west of Bristol should be considered. In addition to the possible locations suggested in the JSP, expansion of Bristol into Severnside (Easter Compton, Pilning) should be considered.

The map of Environmental Assets (figure 4) is a good starting point for a more refined assessment of the quality of non-built land. It shows that most non-built land is either Green Belt or of high environmental value.

The review of the green belt should take into account the benefits ascribed to green belts in the National Planning and Policy Framework, as well as the primary purposes, especially:

- providing opportunities for access to the open countryside for the urban population
- providing opportunities for outdoor sport and outdoor recreation near urban areas
- the retention of attractive landscapes and the enhancement of landscapes, near to where people live .

Any release of Green Belt should embrace a strategy for improving, where appropriate, the quality of what Green Belt remains and identifying new areas at the edges.

### **Broader concerns**

The following issues require particular focus and more debate:

**Landscape quality in Bristol** – the JSP paper (2.10) makes play of the quality of the rural landscape, and the World Heritage Status of Bath, but underplays the landscape quality in Bristol. Bristol too has a wealth of heritage assets and quality green infrastructure that needs protecting ! Bristol’s environment needs to be protected and enhanced if it is to continue to be the thriving centre of the region. In particular, its green spaces need to be protected and more public spaces created from the remaining brownfield sites.

**Urban intensification** – in principle we are in favour of urban intensification in Bristol as part of the solution, where it can be achieved without damaging essential green infrastructure, because it makes use of existing transport infrastructure and services, and leads to shorter journeys. But it is a difficult subject: it is difficult to retrofit greater density in existing residential areas, it can be more difficult to build on brownfield land, the development costs

sometimes rule out affordable homes, and it may require additional soft infrastructure – eg schooling.

We understand that Bristol Council is reviewing its existing sites allocations to see if intensification is possible. This needs to be followed up with:

- a strategy for pursuing intensification in certain locations, eg neighbourhood centres in Bristol, areas where highways take excessive space, areas of employment where the space is used inefficiently, parts of South Bristol where current residential development is less dense and to take advantage of recent investments in health and education facilities.
- masterplanning in those locations
- funding to bring the development of the area to a level where commercial development becomes attractive, perhaps using funding that would otherwise be spent on transport infrastructure.
- exploring new delivery mechanisms, not relying on private housebuilders, in order to unlock the full potential of the existing urban area
- community engagement in eg neighbourhood centres

**Quality of new development** – the Issues and Options paper recognises the importance of quality design and place making as follows:

“2.5 The quality of new housing development has, at times, been perceived to be of poor design and not an integral part of place making. ...

2.6 Patterns of development in the past have often contributed to low levels of physical activity, leading to increasing obesity and an increased risk of physical and mental ill health issues, putting a strain on health services.”

However, the paper is not clear on how this issue will be addressed. We think that the JSP should address this issue. The West of England local planning authorities should adopt policies to ensure that new developments encourage active travel. Such policies 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.

**Housing density** - The West of England local planning authorities should adopt policies to discourage volume housebuilders’ large low-density developments, which are wasteful of land, have poor connectivity, and produce low volumes of affordable housing. If areas outside brownfield development are to support mixed and sustainable communities, there must be a break with the tradition of low density, mini-garden plot developments. To increase the density of town extensions and new settlements would reduce the demand for land and improve connectivity. There are plenty of examples of cities on the continent that demonstrate how higher density can be designed well.

**Control of housing development** – it is important that the RSP tackles not just the ‘where’ and ‘what’, but also the ‘how’ and ‘when’. it is one thing to plan *where* new housing development will be, but it is equally important to plan and control *how* it will be delivered. It is a recognised weakness that 70% of houses are built by large housing firms: the planning authorities need to act smartly to influence how and what they deliver, and the JSP should cover:

- the approach to releasing land for development, balancing brownfield and greenfield sites, and if possible releasing small parcels of land to encourage variety and smaller housebuilders
- the likely timescale of introducing supporting infrastructure for any proposed significant new development area.
- purchase of land by councils to influence development

**Sub-regional working** – whilst the four councils have a legal ‘duty to co-operate’, we are concerned that the final JSP will be influenced by each council’s parochial interest, particularly when three of the Local Authorities declare in the introduction to the JSP that the green belt should not be reviewed, and ‘Protection of the green belt’ is the first in the list of spatial options. It is difficult to see how a coherent sub-regional strategy will emerge when there is such fundamental disagreement between the participants.

This is not helped by the inclusion of much of Bristol’s conurbation and new development outside Bristol City Council’s boundary, which can create an imbalance between Bristol and the surrounding local authorities in both revenue income and capital expenditure on infrastructure (hard and soft). This at a time when the Government is reducing the total revenue base.

### Consultation questions

#### Critical Issues

**Q1** Have the most appropriate critical spatial issues been identified in addressing housing and wellbeing; the economy; the environment; and transport?

**A1** Yes. It is accepted that some things, eg retail and schools, have been excluded in order to make the work manageable. It is accepted that some things, eg quality of place at a local level, are for Local Authority planning policy – however, the JSP should address some high-level best practice principles.

#### Proposed Vision

**Q2** Is our vision the most appropriate one for guiding development and growth in the West of England up to 2036? Are there any changes you would like to see to the vision?

**A2** We strongly support the vision statement, in particular the sentence: “Patterns of development and transport will facilitate healthy and sustainable lifestyles.”

#### Spatial Objectives

**Q3** Are the spatial objectives the most appropriate ones for guiding development and growth in the West of England up to 2036? Are there any changes or are there other objectives you would like to see?

**A3** We support the 10 spatial objectives under the headings Housing & wellbeing, Economic growth, Transport & Infrastructure, Environment.

#### Housing need

**Q4** Are we planning for the right number of homes? Is there anything else we should take into consideration regarding the number of homes?

**A4** We defer judgement until alternative projections become public, and will listen to the arguments made for those projections.

**Q5** What needs to happen to ensure the homes we need are built by 2036?

**A5** This is a huge question. We cannot add to the work done nationally (the KPMG/Shelter report into the housing market), or locally (the Bristol Housing Commission report). It is important that measures are put in place to encourage smaller local housebuilders, as that will increase capacity to build, and will add to variety and character of housing.

**Q6** What needs to happen to ensure enough of the homes built are affordable?

**A6** Again, this is a difficult issue, which can only properly be addressed by wider measures to address the dysfunctional housing market. We cannot add to the work done nationally or locally on this issue. Some intervention at a local authority level, assisted by central government funding, seems required. Councils and housing associations need to build affordable homes, not just private developers.

#### Employment needs

**Q7** Have we identified the right employment issues?

**A7** Not sufficiently. Whilst it has been identified that “the right employment opportunities are available to communities and that an appropriate level of employment land is available in the right locations”, it is not clear from the short section on employment whether the Economic Development Needs Assessment (EDNA) that has been commissioned will be granular enough. One of the Strategic Economic Plan’s objectives is to “Create places where people want to live and work”, which is hugely important in spatial terms because it reduces the need for daily travel. The EDNA should where practical seek to match communities with employment sites in order to minimise travel to work journeys.

**Q8** Where should new employment land be located?

**A8** The EDNA should where practical seek to match communities with employment sites in order to minimise travel to work journeys.

#### Meeting development needs within existing cities and towns

**Q9** Is our priority of building more homes in Bristol and our main towns appropriate and how can this approach be achieved?

**A9** Yes, it is appropriate. It can be achieved by urban intensification and urban extensions. We understand that Bristol Council is reviewing its existing sites allocations to see if intensification is possible. This needs to be followed up with:

- a strategy for pursuing intensification in certain locations, eg neighbourhood centres in Bristol, areas where highways take excessive space, low density employment sites
- masterplanning in those locations
- funding to bring the development of the area to a level where commercial development becomes attractive, perhaps using funding that would otherwise be spent on transport infrastructure.
- exploring new delivery mechanisms in order to unlock the full potential of the existing urban area
- community engagement in eg neighbourhood centres

#### Strategic locations

**Q10** Have all the reasonable strategic locations been identified? Are there any others we should consider?

**A10** Easter Compton/Severn Beach/Pullen ?

An urban extension to the East or South-West of Bath (which would not adversely affect the World Heritage Site or the Cotswolds AONB) ?

**Q11** Do you have comments on the suitability of any of the strategic locations?

**A11** There are a number of strategic locations on the edge of Bristol in the Green Belt. None of these should be ruled out at this stage. Expansion along the rail corridors east and south-west of Bristol should be considered. An urban extension at Hicks Gate should not be ruled out, but maintaining a rural break between Bristol and Keynsham is important.

**Q12** In your opinion, do some strategic locations have advantages or disadvantages in terms of addressing the critical issues identified in chapter 2?

**A12** No comments other than comments below on scenarios

#### Spatial scenarios

**Q13** Which spatial scenario (or mix of scenarios) is likely to best deliver the plan’s objectives?

**A13**

Scenario	Viable ?	Comments
1 Protection of the green belt	No	Whilst protection of the green belt must remain a cornerstone of planning policy the principle must not become absolute. When an 18% increase in housing is required and the green belt accounts for 48% of the plan area, it is unrealistic to hold unquestioningly to the existing green belt area. Some areas of the green belt have few environmental or landscape qualities. Urban extensions, if done sensitively and in areas that capitalise on transport connectivity, are acceptable. Green ‘wedges’ can be retained to moderate urban sprawl.
2 Concentration on the Bristol	Yes	

urban area		
3 Transport focused development	Yes	No single scenario is likely to provide the additional accommodation needed. The Society suggests that these three scenarios should, in some combination, determine the choice of location of new development.
4 A more even spread of development – Bristol and other towns	Yes	
5 Focus on a new settlement or a limited number of expanded settlements	No	Evidence shows that non-organic new towns established by top-down planning policy have an uncertain future. Without securing key employers pre-development, it is probable that the majority of the new residents of a new settlement (or a limited number of expanded settlements) would travel to work at established employment centres such as Bristol, Cheltenham and Cardiff.

**Q14** If a new settlement is a solution, how big should it be and where would you suggest it could go?

**A14** We accept the judgement that there is no feasible location in the WoEP area for a significant new settlement.

**Q15** What transport improvements or measures would be required to support the scenarios?

**A15** The Society supports:

- traffic management of traffic coming into Bristol, eg further park and ride locations on the edge of Bristol
- traffic management of traffic coming into and through Bristol city centres.
- a concerted effort to improve bus services, to replan routes and increase frequency
- maximising the use of existing rail infrastructure, eg re-opening stations on existing lines
- improvements to walking and cycling *networks*, not just on single routes and 'superhighways'.
- schemes to make walking, cycling and public transport easier, safer and more attractive