



an independent force for a better Bristol

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## **Response to the WECA Spatial Development Strategy consultation**

### Form of response

The Spatial Development Strategy (SDS) consultation is in the form of a number of survey questions, rather than a request to comment on any proposals, and the next step in the process in autumn 2021 is to go straight to publication of a draft strategy, with accompanying evidence. Whilst we welcome a two-stage process if it speeds up the process from the three-stage 'Issues'/'Issues and Options'/draft document of the Joint Spatial Plan (JSP) and Local Plans, we find this SDS consultation very high-level and think that moving straight to an 'Issues and Options'-type consultation might have worked better. We note that North Somerset Council has moved quickly from the 'Issues' stage for their Local Plan consultation last August to the 'Issues and Options' stage now, so it seems possible to move quickly whilst retaining 3 stages of consultation. We are impressed by North Somerset's approach to consultation.

We doubt how much value can be placed on the approach taken by the consultation questions, based on prioritising criteria. We do however answer the consultation questions – see the end of the response. There is no specific invitation in this consultation for respondents to submit a statement of what they would like to see in the SDS, but that is what we think would be most helpful and so it is what we have chosen to do.

### What we would like to see in a SDS

#### 1) Review of the Green Belt

The definition of the Green Belt is embedded in the consultation questionnaire, and we reproduce it below.

The Green Belt is land designated around urban areas to maintain the open nature of land and prevent urban sprawl. It is designated based on five criteria set out in national policy:

1. to check the unrestricted sprawl of large built-up areas;
2. to prevent neighbouring towns merging into one another;
3. to assist in safeguarding the countryside from encroachment;
4. to preserve the setting and special character of historic towns;
5. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land

A case may be made for reviewing the existing extent of the Green Belt in exceptional circumstances. Green Belt review happens through the plan making process.

**We think there is a case for a review of the Green Belt.** Given that the Green Belt currently covers 48% of the West of England area, compared with 13% across England, the pressure to build more homes should lead to a review of the Green Belt to make sure that the land designated deserves protection more than other areas, and that the designation does not produce unintended adverse consequences. The JSP that was rejected by Examiners showed that a spatial plan that prioritises avoiding development in the Green Belt leads to development in less sustainable locations. It leads to excessive planned expenditure on radial roads crossing the Green Belt so that people can access city-based jobs.

**We think a fundamental review is needed.** The JSP allocated some housing in the Green Belt but not in a systematic way. It took little account even of its own analysis of the value of particular parts of the Green Belt. We suggest there should be a comprehensive review now, taking into account the policies set out in the National Planning Policy Framework (NPPF) and the Green Belt guidance the Government published in July last year.

The NPPF stresses (paras 138 and 141) the need to take account of public transport in any review and to seek compensatory improvements in environmental quality and accessibility in remaining Green Belt if areas are removed. The 2019 guidance elaborated on this last point: it referred, amongst other things, to new and enhanced green infrastructure, new and enhanced walking and cycling routes, and new recreational provision. There are obvious links here to the Green Infrastructure Strategies that WECA and its constituent local authorities are developing. We would like to see less Green Belt of limited value and instead a network of green spaces of varying sizes and shapes, easily accessed and enjoyed by everyone.

This might lead to green fingers/wedges on the edge of conurbations, in order to retain the advantages of green infrastructure. It might lead to de-designation of Green Belt along existing public transport corridors.

Other points:

- we acknowledge the difficulty of challenging the political and public support for the retention of every last bit of the extensive Green Belt, but it should be done.
- we acknowledge that the SDS cannot directly review the Green Belt, but it can at least propose it.
- we think it is disingenuous to include "The existing Green Belt extent" amongst the options under the consultation question: 4. Which of these are the most important when deciding where new development should be limited?

2) A transport-focused approach

**We propose a transport-focused approach to allocating housing development.**

Anything else leads to an excessive need for investment in transport capacity for the new housing sites, including road-building. And it leads to more journeys, and more congested roads. Rather than build 'in the middle of nowhere', build where the transport links are.

**The most practical and economic way to extend a city is in linear form, based around a public transport line, provided in advance of the development,** with the development phased, one station stop at a time, to match available finance and creating an attractive alternative to the motor vehicle. If a line were already there, development would be attracted. Think M4/M5 and Parkway Station, directly followed by the rapid growth of the North Fringe and Cribbs Causeway Shopping Centre. Take an existing rail line, to Yate, say, and then to Chipping Sodbury, any improvement needed for commuter

use, could be phased, a stop at a time, moving out from the edge of the city and ready before the settlement was complete - perhaps phased under normal planning powers. It is a method that could be used on any form of transport line, with different transport modes. It involves investing in infrastructure before housing is built, rather than the other way round. Transport should come before housing if cars are ever to be left at home. This approach depends on the public sector (WECA or the relevant local authority) having funding from government to do it at the right time.

In the longer-term, it is possible that the transport options into Bristol could include an extension of the mass transit system planned by Bristol to include light rail and tram options radiating out from the city. This could lead towards linear developments out through the Green Belt as described above, much like London Underground's early routes.

**We recognise that a transport-focused approach could mean denser development** within our cities and towns. This has to be balanced against liveability considerations, as Bristol's Urban Living Supplementary Planning Document tries to do. Density can be achieved without building tall, and we do not believe that tall buildings provide a healthy living environment for most people.

### 3) An analysis of changes in direction

There are some major societal changes that will come through in the plan period. Some of these imply a step-change in thinking, and their impact needs to be addressed:

- the COVID pandemic seems likely to lead to a permanent increase in **working from home** and **shopping online**. This has reduced the number of commuter journeys, but currently this is offset by increased private vehicle due to an avoidance of public transport. We suggest that the plans should assume **a return to public transport** over time.
- the COVID pandemic has led to a **greater appreciation of the 15 minute neighbourhood**.
- the 2030 zero emissions target requires **a step-change in transport use**. A [report](#) by a group of University of Bristol postgraduate students found that the share of journeys by car needs to be cut by 31 percentage points, and at least 55 per cent of journeys need to be made on foot or bike, if Bristol is to meet its 2030 carbon-neutral target.
- **broadband connectivity** should be just as much part of the strategy as transport connectivity

These changes need to be brought together into a single vision. Although greater digital connectivity might suggest that a more diverse spatial development may be acceptable, there remain other reasons why a policy of prioritising new development in larger settlements with good transport links should continue to prevail:

- whilst digital connectivity may reduce some journeys, delivery journeys will increase, and leisure and social journeys will probably increase.
- heat networks are much more economic in larger settlements

### 4) Rural villages

Rural villages should be allowed to grow slowly in order to accommodate local people who are otherwise forced out. A look at the statistics shows that the populations of many villages are growing steadily older since only the elderly have the cash necessary to purchase the restricted housing stock. Villages have to be treated individually: each has a Parish Council and local character – and should really have its own plan which interprets what rate of slow growth is appropriate.

## The 15 minute neighbourhood

**We welcome the consideration of 15-minute neighbourhoods** Whilst the concept might seem to fit better with Local Plans, in this consultation it helps to:

- remind us of the human and social aspects of planning
- reinforce a transport-focused approach to spatial planning, which we support, including the importance of walkability at the local level.
- in addition to its use in spatial planning of new development, remind us of the existing spatial allocation of services which are worth retaining at a local level.

The 15-minute concept has an obvious application in Local Plans.

For *new* neighbourhoods, it implies that layout is important for establishing walk and cycle routes, and that space should be allocated for facilities like a primary school and local shops for daily essentials.

In an *existing* neighbourhood, which is much more constrained, it implies Liveable Neighbourhood and Healthy Streets interventions - to encourage walk/cycle trips and make access to local destinations more welcoming, safe, convenient and inclusive.

This is not a new concept: it can be traced back to the neighbourhood ideas of the late 1940s that underpinned new town planning in the 1950s. The experience of applying neighbourhood principles in places such as Harlow shows that it is a concept best kept conceptual in relation to most facilities rather than being rigidly applied. Local circumstances vary in time and space. Planning today, even more than in the 1950s, cannot prescribe where businesses choose to locate and where people choose to work.

Even allowing for growth in local workspaces and working from home, we think it unrealistic to expect most people to live within a 15 minute walking distance of their workplace. We hope there will be efficient public transport for them within 15 minutes though.

We suggest the following list of what could be included in a 15-minute neighbourhood. We recognise that the planning system cannot deliver all these things.

### Buildings (co-located)

- shops for daily essentials (newsagent, bakery, supermarket, post office counter)
- primary school and pre-school/nursery
- primary health services and chemist
- local hospitality (pub, café, restaurant)
- community meeting space
- employment workspace

### Public space

- high quality streets and spaces
- a children's playground
- accessible green space
- seats for social interaction

### Accessible routes to destinations

- attractive and safe walking routes
- attractive and safe cycling routes (segregated where on busy roads)
- bus/tram stop/mobility hub for good public transport to other essential facilities

The concept is currently appearing in plans around the world. Generally, the concept is being used not only as a place strategy (list of local destinations) but also as a transport-based strategy. And the concept seems to be used more as a vision or ‘branding’ rather than detailed policy. We found the following helpful:

- Melbourne Plan for 20 minute neighbourhoods: <https://www.planning.vic.gov.au/policy-and-strategy/planning-for-melbourne/plan-melbourne/20-minute-neighbourhoods>
- Sport England’s Active Design: <https://sportengland-production-files.s3.eu-west-2.amazonaws.com/s3fs-public/active-design-how-to-use-section-oct-2015.pdf>

### Consultation questions

<b>Core questions</b>	<b>Suggested answer</b>
1. Which of the following statements do you consider to be the most important for the <b>vision</b> of the future of the region? <i>Rank as many as you like 1,2,3 ... 8</i>	Answer: all are important, and there seems no value in prioritising them !
2. How important are the following in planning for clean, inclusive recovery and growth in our region? <i>Scale is “very important” etc</i>	Answer: all are important !
3. What features and facilities do you consider to be most important to access within easy reach (15 minute walk) of your home? <i>Open question</i>	Answer: see above

<b>Topic-based questions</b> <i>Scale is “very important” etc</i>	<b>Suggested answer</b>
4. Which of these are the most important when deciding <b>where new development should be limited</b> ?	Answer: all important, except “The existing Green Belt extent”, which is disingenuous to include amongst the other options, which are of a different nature.
5. How important are the following when considering <b>opportunities for new development</b> ?	Answer: all important* but the following are overridingly important: <ul style="list-style-type: none"> <li>- Focus new growth close to public transport corridors</li> <li>- Focus new growth close to town centres and employment areas</li> <li>- Review the Green Belt whilst maintaining its role and function</li> </ul> <p>* except “Safeguard existing employment areas in anticipation of recovery” is too simple. Existing employment areas may not be sensibly located and suitable for hosting the type of employment needed in a low carbon economy.</p>
6. How important are the following considerations for reducing the <b>carbon footprint</b> of new development?	Answer: all important but the following are overridingly important, because they contribute most to reducing emissions: <ul style="list-style-type: none"> <li>- Access to sustainable travel options</li> <li>- Efficient buildings that reduce the need for heating</li> </ul>

7. How important are the following considerations for <b>adapting to the impacts of climate change</b> ?	Answer: all are important !
8. How important are the following considerations for planning in response to the <b>ecological emergency</b> ?	Answer: all are important !
9. How important are the following to ensure new development can support <b>green travel choices</b> ?	<p>Answer: top priority are:</p> <ul style="list-style-type: none"> <li>- “Ensure new development is close to public transport connections” and</li> <li>- “Ensure new development is close to walking and cycling connections”.</li> </ul> <p>Other options seem for a transport plan, not a spatial plan ?</p> <p>Add ‘Other’:</p> <ul style="list-style-type: none"> <li>- improve walking infrastructure.</li> <li>- improve cycling infrastructure.</li> </ul>