

SHAPING BRISTOL OVER THE NEXT 20 YEARS

BRISTOL DEVELOPMENT FRAMEWORK – CORE STRATEGY

RESPONSE TO THE PREFERRED OPTIONS

CONSULTATION DOCUMENT January 2008

by

CAMPAIGN TO PROTECT RURAL ENGLAND (CPRE) Avonside Branch

Introduction

CPRE welcomes the opportunity to comment on the above document. We have not responded on the questionnaire template as we do not feel that this would be the most helpful way of presenting our comments, but we have related our remarks to the relevant sections and questions.

We have some concerns about the timing of the present document and the associated consultation:

- The decisions of the Secretary of State on the proposed amendments to the RSS by the EiP Panel are as yet unknown. Given the role of the RSS in shaping the framework within which the BDF functions, the final version of the RSS may require further changes to the document, thus some observations made at this time may be irrelevant.
- A considerable number of associated major studies are mentioned in section 2.2 which are not yet available, while the review of the Community Strategy and Corporate Plan are still underway. Given their importance for the BDF, it would be more helpful for the consultation process if they had been available before the Preferred Options document was produced.

As a result of this rather piecemeal approach, it is difficult to make fully informed and meaningful comments at this stage.

Perhaps even more fundamental to the relevance of the Preferred Options paper, it has been published at a time when there is growing uncertainty about the future of the UK economy and the level of demand for house purchases in coming years. While the Bristol area is one with a normally buoyant economy, it would be unwise to assume that earlier predictions made about population, employment opportunities and the housing market will be born out, especially in the BDF's early years.

We appreciate that the City's approach to the development framework "formula" is driven by the requirements of the RSS but we are concerned that such predictions are still the main drivers in a "predict and provide" approach to the long term development proposals for Bristol. This approach will only encourage a continuation of the trend towards "land grabbing" by the quickest

developer off the mark, who then fails to produce an outcome which lives up to our expectations and aspirations.

Comments on “The Preferred Option”

Key Issues Summary (p7)

Social issues

1. As mentioned above, house building needs to be planned to meet proven need, not current speculative projections.

Economic Issues

8. It is surprising that tourism only receives a mention in the context of tourism development giving greater opportunity for locally based activities thus reducing the need for travel. A city with Bristol’s historical background would normally be expected to give a much higher profile to the need to promote the city as an attractive place to visit and to the provision of relevant facilities.

Environment/physical Issues

12. We note that the issue “ensuring effective water management” which was listed in the Issues and Options document has been omitted and replaced with “mitigating ..climate change, particularly the potential for flooding...” We would have assumed that “water management” had a wider meaning than this, especially given the enormous scale of development which is proposed and the likely level of demand for water supply and drainage.

Similarly the need to provide a sustainable infrastructure prior to any major developments should be recognised as a key issue.

Proposed Spatial Vision (Q1)

The introductory paragraph is a bit “limp”. Words like “vibrant”, “distinctive”, or “stimulating” would be appropriate here.

There is no specific mention of provision for walking and cycling – a key factor in making a city “sustainable” and adapting to climate change.

There is also no specific mention of provision for education, leisure, sport or culture in the list, although they are highlighted as key issues.

The international role of the City Centre probably needs establishing, before it can be maintained or enhanced. What about the national and international role of the city as a whole?

One obvious problem relating to the achievement of some of the aspirations of the Vision is that they are heavily dependent on other agencies for their success. Some mention of how the City will work with these agencies would give more credibility to the wished for outcomes.

Proposed Strategic Objectives (Q2 – 3)

Objective 1. Ensuring a sustainable future for Bristol

We welcome this as a prime objective, although the phrase “a Green Capital” needs clarifying. Capital of what?

However we do not believe that implementation of BCS 14(housing provision) will help achieve this objective because predicting a requirement for 29,500 (or the RSS revised figure of 30,000) and then providing for them is not a sustainable approach. CPRE believes that a “plan, monitor and manage” approach is far more so. Housing provision should only be scheduled after a clear need has been identified and should initially be targetted on brownfield sites. There is a real risk that once greenfield sites have been released, particularly in the Green Belt, they will be cherry picked by developers, leaving city areas which urgently need regeneration still unimproved.

BCS13 (transport and accessibility) should also have a major part to play in this objective.

Objective 4. Appropriate housing provision

“Appropriate” is a key word. See comment above under objective 1. It would be a major challenge to provide for the predicted numbers in a balanced and sustainable way.

Objective 8. Improved accessibility and connectivity

Neither this objective, nor BCS 13 mention improved provision for pedestrians and cyclists which will be a key factor in providing sustainable access to destinations.

Other Strategic Objectives

Given that “community involvement and engagement” is included as a specific objective, we feel that there is similarly a place for including “**Coordinated and cohesive programmes agreed with neighbouring authorities**” as a further objective. The enormous impact of the proposed urban extensions which will be located outside the city boundaries will make huge demands on the city’s facilities and infrastructure.

Preferred Spatial Strategy Option (Q4-6)

We agree with the proposal to spread development across the city.

Perhaps more prominence should be given to the area in the vicinity of Temple Meads station. This is a key transport hub and an ideal location for residential and leisure development.

We are however very concerned at the proposal (5.6) for integrated extensions to the urban area within Bristol and particularly to the suggestion for adjustment to the Green Belt. The crucial element of the Green Belts is the permanence of their boundaries. **(see comments under BCS05)**

PROPOSED CORE POLICIES

BCS 01 Economic , social and physical regeneration of South Bristol Q7-9)

We agree that regeneration of this area has an important part to play in addressing the problem of North-South imbalance in the city. Achieving the desired outcome will be a major challenge and we are concerned that mistakes that have been made in the past are avoided. It is vital that employment and infrastructure are put in place at an early stage so that the area doesn't just become a residential dormitory suburb. The "potential" district centre needs to be a reality, and close control needs to be kept to ensure that employment, housing and community facilities all keep pace with one-another.

We are still concerned at the question of selling off "low value" open space, particularly in more disadvantaged areas. We would like to see suggested locations carefully reviewed before they are disposed of, with a view to seeing whether they could be improved and revitalised. There are many examples of areas in other cities which were renowned for dumped rubbish etc, which have been transformed by involving the local community.

Regeneration of this area could be aided by the encouragement of a high level academic "presence" in the area, possibly a satellite of one of Bristol's existing universities, which could act as a "draw" for high tech and knowledge based companies, "blue sky" research and as a place for professionals to live near to their jobs. The attraction of the area would be greatly aided by the location of a variety of excellent leisure and sporting facilities, including a swimming pool.

Bristol's iconic suspension bridge was the result of a competition. Perhaps this approach would lead to the creation of an exemplar urban area which people were proud to live and work in.

BCS02 Enabling growth of the City Centre (Q11-12)

We would support the intention to prioritise Stokes Croft and Old Market for regeneration. Mention has already been made that the Temple Meads area has great potential for residential as well as office development, given the presence of the station as a transport hub for a hopefully much improved rail service.

Re-use of unoccupied buildings should be a priority.

As previously noted, we are surprised that there is no mention of tourism in the context of the City Centre.

BCS03 Redevelopment of Part of St Philips

We are pleased to note the reference to taking sites of nature conservation value into account in any developments and to creating a green infrastructure.

Improvements in public transport access will also be required

We feel it is essential that an Area Action Plan should be prepared. These are now common practice.

BCS04 Economic, social and physical regeneration of the Northern Arc and Inner City East (Q16-18)

It is important that regeneration continues in these areas in tandem with development in the south.

We would like to see policies included on improving transport, leisure facilities and green infrastructure in BCS04 rather than just an emphasis on higher density development

Area Action Plans – see comment under BCS03

BCS05 Extensions to the urban area/Green Belt (Q19-21)

CPRE is in favour of the intention (5.23) to develop phasing mechanisms, but it strongly opposes the draft RSS proposal to redraw Green Belt boundaries to cater for encroachment. There is an urgent need to avoid the merger of settlements (currently ensured by appropriate Green Belt status of sensitive areas), which could arise from inappropriate development.

Resulting urban, or rather suburban, sprawl can also have a devastating effect on the sustainability of a city as a whole.

There should be greater recognition of the positive health benefits which can be gained from easy access to open countryside for leisure and recreation , and urban extensions should not be allowed to eat away at the countryside in neighbouring authorities.

Flood risk issues also need to be addressed before building is considered and the adverse impact of further run-off from development factored into the already vulnerable flood risk position.

We propose that joint working should be included as a strategic element of the Policy. Joint planning strategies across the sub-regional housing market would seem vital in the face of the likely implications of the RSS.

Joint Area Action Plans for Urban Extensions should be an integral part of the initial planning process because of the scale of the impact which such extensions will have, both on the city and on the countryside in neighbouring authorities.

BCS06 Avonmouth/Bristol Port (Q22-23)

There are clearly major implications for any future development of this area resulting from its sensitive location and the implications of climate change. We

will be interested to see the results of the continuing joint work with South Gloucestershire on future plans for the area.

PREFERRED DEVELOPMENT PRINCIPLES

We are encouraged that the Council will “**engage fully with the community and stakeholder (sic) to develop the detailed wording of these Core Policies**”. CPRE welcomes the opportunity to be involved in this further consultation.

BCS07/08 Urban Design, built environment and urban character (Q24-25)

We are pleased to see a commitment to the quality of urban design which has so often been a disappointment in Bristol in the past. Standards need to be binding.

Perhaps mention of the HELM guidelines on suburbs and the historic environment would be appropriate.

We would wish to see reference to the importance of the natural as well as historic environment, as this is vital to the appearance and quality of urban environments.

BCS09-12 Climate change, energy and waste (Q26-27)

BCS09 We welcome the proposal for “Eco-neighbourhoods”. The volume of future development which is proposed in the Core Strategy poses a huge challenge to the quest to reduce emissions and ensure sustainable environments. However care will be needed with determining exact standards required, as well as a flexible approach to adapting them to any advances which are made in relevant technology during the lifetime of the Core Strategy.

.BCS12 There is also a need to work with other parties to reduce packaging and food miles eg. through the promotion and support of local food.

The reference in 6.4 to directing development to locations which minimise the need to travel by car should be included as a main element in the Policy.

BCS13 Transport and access improvements (Q28-29)

Provision for public transport and safe routes for pedestrians and cyclists is a key factor in achieving the “overarching issue” of ensuring a sustainable future for Bristol. All attempts at achieving this aspiration will fail unless there is a step change in the quality and efficiency of public transport provision and in public attitudes towards using it. We are aware of present constraints imposed by ownership of the public transport system in Bristol, but the picture may be quite different by 2026.

We would like to see the element of the policy relating to public transport read “support and **prioritise** the delivery of significant improvements to public transport services...”

It is well recognised that building new roads does not always have the desired effect. More roads encourage more traffic. They are not a long term solution to congestion, they increase noise and pollution and do not encourage the desired change in behaviour which is necessary to reduce dependency on the car. We would hope that the element “support the delivery of strategic transport infrastructure required to support the proposed level of growth” refers to more than just roads, as it is separate from the policy element relating to public transport.

The policy should make reference to provision for pedestrians and cyclists and the need to prioritise them in planning decisions.

The present popularity of the Bristol section of the Bristol to Bath cycle path for both walkers and cyclists indicates the high value which is placed by people living in an urban environment on having access to an attractive and safe pathway which can be enjoyed by people of all ages and levels of fitness both as a route to work and as a leisure facility.

We would also like to see specific reference to working with communities to establish car clubs, pedestrian zones etc.

Reports of the discussion at the Joint Transport Forum are encouraging and would like to see mention of support for innovative ideas included in the policy.

BCS14-18 Population change, household growth and housing (Q30-32)

BCS14 See earlier comments on CPRE’s strong reservations about over-reliance on uncertain projections. While reference may need to be made to RSS figures, we urge that a statement is made of an intention to phase development according to evidenced need.

BCS15 We agree that there may well be site-specific cases where the affordable housing threshold should be below 15 dwellings – for example where the proposed dwellings are adjacent to an existing small development of affordable units. There may be some grounds for requiring small developments without affordable units to make a contribution to affordable housing elsewhere.

BCS16 The layout of the bullet points in this policy needs clarifying. The first bullet point appears to contradict the third. Density could be in excess of 65dph in areas to which the final bullet point applies but could also be less.

BCS19 Delivering a thriving economy (Q33-34)

Consideration should be given to the likely increase in homeworking over the period of the BDF which might impact the need for office based development in some areas.

Again we are surprised at the lack of reference to the development of tourism over the life of the BDF.

BCS20-21 Centres, retail provision and community facilities (Q35-37)

BCS21 We would be pleased if the protection of local shops and post offices were included in this commitment to protect local facilities.

We suggest an additional element in the Policy “ **to seek to retain the character of centres in existing “historic” suburbs**”.

BCS22 Open space, Green infrastructure and nature conservation (Q38-39)

We would like to see a further strategic element to “**protect, enhance and create biodiversity**”.

There should be some reference to the contribution which urban gardens make to the preservation of biodiversity and to the creation of the overall “green” environment. Sustainable management of gardens for the benefit of the urban landscape should be promoted in this policy.

Urban populations are increasingly turning to organic gardening and use of allotments. Given all the associated benefits for health and well being we would like to see strong support for this trend as an element of this policy.

The value of urban trees and woodlands also needs to be recognised and we would encourage their inclusion in addition to references to “green spaces”.

We would also like to see some reference made to the value of city farms within the document, and this might be an appropriate section in which to include it.

Finally, there should be an explicit acknowledgement of the purposes of the Green Belt within the text of this section.

BCS23 Water and flood risk (Q40-41)

We are pleased to note the elements of the policy relating to drainage standards and avoidance of harm to natural watercourses.

The design of new homes should be planned to give increased protection in areas where there may be a future flood risk.

Paragraphs 6.32 and 6.33 Severn Barrage and Bristol International Airport

These two contentious proposals are of considerable concern to CPRE.

We will be closely following the studies on the feasibility of the various proposed schemes for the Severn Estuary and will be pleased to be involved in future reviews of the Core Strategy when any concrete proposals are in place.

We do not feel that Bristol should support increased growth at BIA at a time of increasing economic uncertainties, a requirement to meet the challenge of reducing carbon emissions and reducing transport's dependence on fossil fuels. Any growth will have an adverse sustainability impact on the City which needs to be closely involved in any discussions on mitigating this impact.

Core Policies (Q42-43)

It is impossible to answer the question of whether the proposed Core Policies will successfully deliver the Preferred Spatial Strategy Option and the proposed Strategic Objectives. This document has set out the "Whys" and the "Whats" but not the "Hows". Considerable care will be needed in the production of the SPDs, DPDs and other related documents to ensure that the "Hows" are robust enough to deliver the desired outcome.

Implementation and Phasing(Q44)

It would be foolhardy to attempt major developments which will have such a lasting impact on the future of Bristol without producing Area Action Plans.

Additional Comments (Q49)

The period between 1906 and 1926 was marked by immense technological advances and unexpected demographic changes. While the same level of change may not be in store during the coming 20 years, the Core Strategy for Bristol needs to be as hospitable as possible to advances in technology, including modes of transport, changes in lifestyle etc. and not tied down by strict numerical predictions.

There is little reference in the document to the changing age profile of the population, and apart from the mention in the proposed Spatial Vision of "better outcomes for children, younger and older people, there are no strategic elements in any of the policies relating to provision for specific age groups, especially the elderly. There should for example be mention of provision of accommodation for the elderly in mixed communities in all the proposed development and regeneration areas as well as acknowledgement of their particular transport needs.

The text on the Proposed Spatial Vision in the purple box on pp8-9 could do with further proof reading and editing!

CPRE Avonside Branch
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