

CPRE Avonside Response to Bristol Local Plan Review Consultation

February 2018

Summary

1. CPRE Avonside supports many of the objectives of the proposed Plan revision. We welcome the aims to maximise housing in Bristol and provide affordable housing, including Council and Housing Association housing, to offer mixed tenure options to meet people's needs. Bristol is one of the most sustainable locations for new housing in the West of England, and has the most demand, particularly for affordable housing. If we can ensure city living is a viable and desirable option, this reduces the demand for development in open countryside, which is less sustainable in terms of land-use, access to jobs, services and public transport, and biodiversity. Well-designed new homes can also improve areas of Bristol that currently experience high levels of deprivation.
2. We support the aims to focus on increasing density in the city. Although some higher rise buildings may be appropriate in suitable location, it is important to recognise that increasing density is much more than high rise. We need to look at utilising land that is currently underused, previously developed, and the space above shops and other business spaces.
3. What is vital, in the drive for increased density, is that we don't sacrifice our green and open spaces. Opportunities for access to green space are vitally important to city dwellers. Our urban green spaces and the 'countryside next door' must be retained, looked after and improved so that Bristol residents can lead healthier lives, particularly when they are unable to or choose not to access a private car. For this reason, we are disappointed by the number of green spaces and Green Belt land that is designated for development. Much of this land will already be highly valued by local people, and where it is degraded, the solution is to improve its quality rather than build on it. We need a compact, dense city, but this can only work if we retain and look after the small amount of green space and Green Belt land currently available.
4. The predicted level of population growth in the city means that our transport systems, which already feel at high capacity, are likely to struggle. The resulting air pollution from any increase in private car use will cause expensive and distressing health problems. We look forward to commenting on the Joint Transport Plan for the West of England, and are hoping for an ambitious and forward thinking solution to our current transport problems.

5. We are pleased to note that there will be one Local Plan document, which will make local planning policy more transparent and easier to follow.

Detailed comments on the consultation text

6. Para. 1.5 *'the local plan will be updated to set out how the proposed 33,500 homes will be delivered in Bristol by 2036 - and shows how the Council aims to exceed that amount.'*
7. We are unclear why it is necessary to aim to **exceed** the already high housing target. How will this affect the need to meet future housing targets, for example? We agree that Bristol needs more homes, and particularly affordable homes, but it is vital that the city is able to build the homes people need in the right places. It is vital that Bristol can accommodate this extra housing without undermining quality of life, such as access to green space, clean air, and a reliable public transport system.
8. Para. 2.2 *'The vision for Bristol is of a diverse and inclusive city where the success is shared and where inequality and deprivation have been substantially addressed. The delivery of new and affordable homes through urban living will enable housing needs to be met and help to secure the development of mass transit systems which deliver sustainable, connected communities.'*
9. The vision is welcome, and we absolutely support the delivery of affordable housing, and for Bristol to be a diverse and inclusive city. What the vision does not make clear is how 'urban living' will deliver affordable homes. Para 4.2 Urban Living describes urban living as 'deliver[ing] higher density development to meet our need for new homes'. Although increasing density (coupled with good design) is to be welcomed, it doesn't automatically guarantee affordability. We would like to see more clarity in the vision as to how a range of affordable housing options will be made possible.
10. Para 3.0.4 *'The development strategy sets out a direction for each part of the city and identifies specific locations of focus for change and development.'*
11. We welcome this *plan led* approach. However, it is vital that a) infrastructure comes first; and b) that local people are fully involved in decisions on proposals for their area. We are unable to comment on all the Development Strategy Areas at present, but have the following comments on the intention to remove areas of Green Belt land and to build homes on green spaces.
12. **New neighbourhood at Bath Road, Brislington.** Para. 3.3.11 *'The current local plan indicates land in the Green Belt at South East Bristol that acts as a contingency for meeting future housing needs. The level of housing need in Bristol and the West of England means that it is now appropriate for this contingency to be brought forward through the development of a new neighbourhood.'*
13. As there is an intention to intensify building in the city of Bristol, and still a good number of previously developed sites available, we do not support building in the Green Belt at Brislington at this stage. Urban areas need their green spaces and, while we welcome the retention of the allotments, it is not just allotment holders that require access to green space. Green Belt land has the highest protection from development in planning policy, for good reason. It is the **permanence** of the

Green Belt that has been its success, ensuring that city dwellers can access green space, and encouraging cities to regenerate and intensify, using otherwise wasted space, before building outwards. We would like to have the opportunity to comment on this proposal in detail at a later date, and welcome the intention to include community consultation and take account of comments made on the Joint Spatial Plan.

14. **We would like to see a sequential approach included in this local plan that ensures that all building on green spaces is avoided until all options for intensifying and re-using land have been exhausted.**
15. **If green spaces or Green Belt has been degraded, then it is necessary to find ways to improve and regenerate that land, prioritising access, woodland and food growing.**
16. *Changes to Green Belt at South West Bristol Para 3.3.19 ‘The construction of the new MetroBus route and the South Bristol Link (Colliter’s Way) has changed the character of the South West edge of the city. The Green Belt previously provided an uninterrupted connection from the very edge of the built up area into the wider countryside.*
17. *Para 3.3.20 The new link road and part of the MetroBus system has the effect of separating the area to the east from the rest of the Green Belt. The transport infrastructure acts as a boundary. In order for the Green Belt to serve its purposes it is no longer necessary for it cover all areas to the east of the link road. The boundary can therefore be amended through this plan review.*
18. We do not support the suggested changes to the Green Belt at South West Bristol. The suggestion that the new road [Colliters way] is the reason for changing the Green Belt boundary is perverse. Roads are not uncommon in Green Belt areas, and much of the land on the city side of the road is ‘open’ and, as the consultation suggests [para 3.3.21] ‘*Much of the area proposed to be removed from the Green Belt is important for its prominence in the landscape and for community use. It is proposed these should be retained as undeveloped areas serving the needs of the city.*’
19. **It is unnecessary and wrong to remove land from the Green Belt in South West as a result of the introduction of the new road, Colliters Way. Green Belts often straddle roads, and the areas that need protection as ‘undeveloped areas’ will be much better protected by Green Belt policy than in any other way. Again, Bristol should look to its previously developed land and wasted space before it ‘sprawls’ south into the Green Belt and open countryside. Again, we wish to be consulted in the future on any concrete proposals for change to this area.**
20. Building on the Green Belt is likely to result in the least sustainable housing that will not meet people’s needs for affordable housing. The [CPRE London report, Driving in Circles \(February 2018\)](#) demonstrates that the majority of trips made to and from developments in the Green Belt will be by private car, totalling an extra 5 million extra car journeys a week. ‘*Our research shows that developments planned for London’s Green Belt will be almost entirely car dependent meaning that most of the trips made by people in the new households will be by car, even where developments are within walking or cycling distance from the rail stations.*’ Bristol, although smaller than London, has a much less well developed transport

network, and the impact of building on the Green Belt is highly likely to generate a significant rise in the number of journeys made by private car, with the resulting negative effect on pollution and congestion.

21. Nor does building in the Green Belt often result in an increase in affordable housing. When protected countryside is released to developers, it's not low cost housing they build, but executive homes for the most wealthy. 84% of homes built on Green Belt in recent years have been for the middle or top end of a market that is already unaffordable for most people unless they already have access to existing housing wealth. Misguided calls to build on Green Belt result in millions of people losing valuable access to green space without doing anything to tackle the housing shortage.
22. *Para 3.4.4 North West Bristol will continue to be a location for urban living. New homes will be provided through sensitive infill.* We cannot assume that infill has and will always be sensitive. In our experience, this is not always the case, and valuable green space has been built on unnecessarily. See comments in para 46 and 47.
23. *'Proposal ULH 2: Affordable housing On residential developments of 5 or more dwellings a minimum target of 35% affordable housing to be delivered on site will be required.'*
24. **We welcome the target affordable housing, and that it includes smaller developments. Given that the target is optimistic, we also welcome the acknowledgement that the viability clause is one of the reasons provision can fall below the target amount, and the way the Council intends to address this. We fully support the Council's efforts to ensure that affordable housing targets are met.**
25. *'Proposal ULH 3: Urban Living - making efficient use of land to meet our needs. Developments proposals should make the most efficient use of land by developing land to the fullest amount consistent with creating a liveable environment. This will include promoting the replacement of or building over low-density uses and extending buildings upwards by using airspace above them.'*
26. **We support the proposal to maximise the efficient use of land, particularly re-using low density uses and extending buildings upwards using airspace above. There is large capacity for new homes to be built in Bristol this way without the need to extend the city outwards or build over any precious green space.**
27. Supermarkets are, for example, often single story buildings that have a large car park attached. A number of supermarkets have and are exploring buildings stores with flats above ([see Space to Build: why we don't need to build on our green spaces to solve the housing crisis, CPRE London June 2017](#)). This publication reports that a number of supermarkets have started to cash in on the space above their shops with *'Morrisons [is] joining rival supermarkets in the housing business with plans to build 700 homes as part of the redevelopment of its Camden store in north London. The supermarket has teamed up with Barratt Homes - which helped Sainsbury's redevelop its Nine Elms store near Vauxhall, south-west London, with more than 700 homes - to put together its plans for Camden'* [The Guardian, 8 December 2016](#).

28. We would like to see a sequential approach to development added that prioritises *'making efficient use of land to meet our needs'* over building on Green Belt and green spaces, which are fundamental for the quality of life of urban dwellers.
29. ***'Proposal ULH 4: Tall buildings - The local plan will encourage high quality tall buildings in the right places and of the right design'***. Tall buildings are not the answer to increasing densities, and can bring their own problems. Within the context of a move towards compact living and increased density, we believe that buildings should be judged on their merits, their design and impact on the character on landscape, rather than their height. The proposal in ULH 3 is likely to have more impact on regeneration and increasing density in the city than are tall buildings per say.
30. Para 4.3.2 *'The growth in student numbers can also bring less positive effects. Concentrations of student accommodation can harm the character of surrounding areas, through impacts on residential amenity and by reducing the diversity of uses across an area.'* We agree with these proposals
31. ***'Proposal HW 1: New development to contribute to delivering the council's Air Quality Action Plan'*** We welcome a new dedicated policy for air quality.
32. Para 6.2 *'New protection for open space - Land identified as Specially Protected Local Green Space will be permanently retained as open space. Development which would result in harm to the land's open character or role will not be permitted'*.
33. We believe that all open space in Bristol should be considered important, whether for wildlife, access, activity or other reason. Much of it is already highly valued by local people, and sufficient access to green space is an essential requirement for any urban dweller.
34. Open space that has been degraded should be considered for improvement, though, for example, tree planting, better access or food growing, before it is relinquished for development. The idea of specially protected open spaces sounds clear cut, but we are not convinced that this process would be sufficient to protect enough open space in the city. A requirement to identify Local Green Space or Reserved Open Space could also mean that less wealthy and less well-resourced areas of Bristol could be disadvantaged if there is less ability or inclination to identify and articulate spaces that should be designated.
35. ***'Proposal HW 3: Specially Protected Local Green Space - Land identified as Specially Protected Local Green Space will be permanently retained as open space. Development which would result in harm to the land's open character or role will not be permitted.'*** This proposal is unclear. If land has been identified to be permanently retained as 'Specially protected', would this not preclude ANY development. This proposal suggests that development which would not harm the land's open character would be permitted. This seems unwise in a Specially Protected Local Green Space. This needs more detail on exactly what development might be acceptable (if any) and if so, in what circumstances.
36. ***'Proposal HW 4: Reserved Open Space - Development involving the loss of Reserved Open Space will not be permitted unless it can be demonstrated that: It is no longer required for its open space function; A deficiency would not be***

created through its loss, measured against published standards for green space provision. Para 6.2.6 Types of spaces that are considered suitable for this designation are spaces that offer a current important role as open space but which could be subject to change if the current function ceases to be needed by the community.'

37. It is essential that the proposal for Reserved Open Space includes the words 'in exceptional circumstances' to make clear that this is not land that has been identified for development (as long as the relevant calculations can be made). We have a number of concerns with this proposal, particularly about who will get to determine whether the reserved space required. We suggest that local communities should get to determine which reserved open spaces they no longer need otherwise, who apart from developers are going to suggest during the consultation that a local open space is only 'temporary'?
38. **The requirement to identify an open space for consideration as specially protected Local Green Space or Reserved Open Space is, as already stated, onerous for most communities. There is a risk that open spaces that deserve protection could be omitted if the local community is unable to fulfil the requirements to identify and articulate the space.**
39. **'Proposal RES 3: Supporting new sustainable design standards'** - we support this proposal.
40. **'Proposal RES 4: Stronger policies for adapting to climate change - Sustainability statements will be required to include an 'adaptation strategy' setting out how the issues would be addressed. This would include site-level adaptations, relating to site layout and the use of green infrastructure'**. We support this.
41. **'Food Systems 7.2.3 Through the proposals in this review and the retained policies, the Bristol Local Plan will continue to contain policies which can help to support and develop food security, local food growing and increasing sustainability within the city's food system as a whole'**. We welcome and support this proposal.
42. **'Proposal RES 5: Stapleton Allotments and Holdings - The Stapleton allotments and holdings will be recognised in the local plan and designated as specially protected Local Green Space in recognition of its special importance for food growing and community use. Developments which are inconsistent with this role will not be permitted. The current designation of the land safeguarding it for transport infrastructure will be removed.'**
43. **We welcome and support the proposal to remove the current designation of the land at Stapleton allotments for transport infrastructure. Such infrastructure is unsuitable in an area of such high quality agricultural land that is well used and highly valued for food growing and education.**
44. **Para 7.2.5 Green infrastructure. DM21 Development of Private Gardens should be included in the list of policies protecting the city's Green Infrastructure, particularly as it's in the later list of retained policies relevant to Green Infrastructure.**
45. **'8. Local Plan policies proposed to be retained. Para 8.2 Comments on the proposal to retain policies are welcomed.'**

46. We are pleased that the policies on protecting Green Infrastructure are being retained. However we do have some concern about DM21: Development of Private Gardens. This policy theoretically protects gardens from development except in three narrow circumstances. The first exception '*unless the proposal would represent a more efficient use of land in a location where higher densities are appropriate*' is consistently being invoked as a reason for permitting development, assuming there are no other material reasons for refusal. Officers appear to be allowing considerable areas of Green Infrastructure provided by gardens to be lost because of the supposed primacy of "sustainability" justifying increased density on garden land. Thus if the site is reasonably near a bus stop or in theoretical walking distance of shops, however small a proportion of a household's shopping needs they would supply, and car journeys presumed non-essential, loss of garden land is seen to be justified and higher density is the exception allowed. In our view however this is not sufficient justification for the loss of valuable green infrastructure provided by suburban gardens.

47. We conclude that the statement in section 7.1.18 that BCS9 and DM17-21 seek to manage the loss of existing green infrastructure assets has become increasingly inaccurate as regards DM21.

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April 2018