

CPRE AVONSIDE COMMENTS ON B&NES “OPTIONS’ CONSULTATION JANUARY 2019

Chapter 3 Spatial Strategy

SS1 Focused approach avoiding Green Belt

CPRE in principle favours a focused approach avoiding the Green Belt entirely, and recognises the advantages this would bring in terms of enabling better social infrastructure. However, we believe it is important to link housing with sustainable transport infrastructure in Midsomer Norton, Radstock and Westbury if increased congestion on all access routes to and from these ‘focussed’ locations is to be avoided. We must stress that without a radical improvement in alternatives to the private car, local authorities’ obligations on quality and congestion will be impossible to achieve whatever the eventual level of new housing identified.

SS2 More dispersed approach avoiding the Green Belt

CPRE takes the view that this is probably the “least bad” of the three options as it could have the advantage of bringing some benefits to a number of villages where more housing is needed, subject to there being capacity in local primary schools and surgeries. However, the acceptability of even this option is dependent on a reduction in the overall level of housing requirement so it reflects latest economic forecasts. This, along with the need for Bristol to take a larger share of the burden, would avoid decanting commuters out into the rural areas with subsequent unacceptable consequences for congestion, sustainability and social inclusion (particularly given the proportion of households in need of housing that are without access to private transport). It is critical to recognise that people unable to afford the high central urban prices of housing are most likely to add to pollution at a number of pollution “black spots” on key access routes. Providing maximum affordable housing within our urban areas would avoid adding to existing problems of pollution and congestion.

SS3 Combination of locations outside and within the Green Belt

This is unacceptable, in principle and, because the overstatement of the housing requirement (given latest economic forecasts) (a) makes any use of the Green Belt completely unnecessary and (b) there is no mechanism available to ensure that sites and locations are developed in a hierarchy, so as to prevent any use of dispersed or Green Belt sites being permitted until “brownfield”, high density and easy access to Bristol have been utilised.

Chapter 4 Bath

BTH1 Policy approach Options for employment

No comment.

BTH2 Housing

The decline and change in high street retailing presents an opportunity, entirely overlooked in these consultations, for the conversion of 'over-shop' premises into residential accommodation. CPRE are supportive of thriving high streets, and there are opportunities to combine residential and retail space to achieve a better mix and provide needed accommodation. This can include reviewing the conversion of entire shops to residential, where retail uses are unlikely to be economic, thus enabling people to live in the city and closer to their places of employment, reducing daily commuting. This option has long been identified but not acted upon. We believe that the 'joined up' responsibilities of the new West of England structure should address the investment contributions to achieve it.

CPRE is also concerned about the absence of 'joined up' policy making between B&NES and Wiltshire in respect of housing development to the East of Bath, within Wiltshire, which is contributing additional commuter traffic into Bath on what are already heavily congested and polluted routes.

BTH3, 4,5,6,7,8

No comment.

BTH9 Policy Options for Bath Park and Ride provision

CPRE believes there is a need to reduce congestion on the inner approaches to the city and thus, inter alia, improve access to essential services for rural residents. One solution to this may be the limited and sensitive capacity increases at the main park and ride sites. However we believe that primarily smaller sites should be identified further out from the major centres, in order to pick up commuters nearer to their homes. Several smaller bus pick up points could also be combined with existing car parking facilities. If this is followed it could open up opportunities for a far more efficient public transport network. CPRE will evaluate new proposals for a new park and ride site to the east of the city when these are published, but expects to see closer working with Wiltshire in the identification of the most effective sites.

CPRE remains of the view that the usefulness of park and ride sites can only be maximised if at the same time services from the sites into central Bath are guaranteed relatively free movement without intermediate stops or delays. We advocate more dispersed park and ride "hubs" further out from Bath which would reduce congestion on the approaches to the main park and ride sites themselves and minimise the extent of expansion of those sites. See above.

BTH10, 11 No comment

Chapter 5 Keynsham and N Keynsham SDL

KSM1 Spatial Strategy for Keynsham

CPRE believes that the spatial strategy for Keynsham is fundamentally misconceived. The overall housing requirement proposed by the JSP is well in excess of what is indicated by the most recent economic forecasts and it is the JSP requirement that is driving the strategy for Keynsham. The overall requirement should be reduced and Bristol required to provide more of its own housing rather than outsourcing it to neighbouring areas, leading to more congestion and pollution because of commuting. There are a number of suitable sites in Bristol, for example, new plans for the old "Arena" site near Temple Meads could incorporate much more ideally located housing, and especially affordable housing and less office and hotel development. It is also questionable whether a further Conference Centre is needed given the proposals for similar at the Bristol City Football ground. Looking at the most up-to-date economic forecasts, CPRE believes that the maximum additional housing requirement should be 73,400, which is some 28,800 homes less than the current JSP target figure. Adopting the lower, more up-to-date figure would largely remove the need for large-scale development at the SDLs, and thus also, many of the additional congestion and pollution problems, although the existing unacceptable levels of both still require significant intervention.

KSM2 Review of existing policies or Keynsham

No comment

KSM3 Garden City Principles

This policy is essentially aspirational and totally lacking both specifics and realism as regards deliverability. In particular, although the aspiration of much greater integration with the rest of Keynsham through cycling and walking is to be commended, the sustainability of the 'garden city' is completely compromised by the impact of additional traffic on congestion and pollution and the lack of early provision of an integrated public transport system, as earlier comments have highlighted. The proposed package of transport measures outlined in other documents poses immense challenges in terms of construction, funding and planning consents, and requires early action ahead of developments if it is to succeed. We look forward to seeing WECA take its opportunity to develop a Bus Quality partnership as part of the process. As things stand the 'garden city' concept is fundamentally flawed. There is little in the document to show how this differs from any other town extension. The position would be alleviated, to some extent, if the amount of Bristol's housing allocated to B&NES were to be reduced in line with the latest economic forecasts, as this would then also reduce the amount of commuter traffic moving between Keynsham and Bristol (see below).

KSM4 Link Road Alignment

There are huge problems with the development in transport terms. CPRE considers that while Option 3 a for the link road may be the 'least bad' of the options available, it does not remotely start to achieve what is needed in order to make the 'garden city' genuinely sustainable. There are already big developments progressing at the Chocolate Quarter (Fry Factory) and on the A4 at on the A4/Saltford boundary, with more safeguarded land reserved for development later. It has to be remembered that Bristol is also planning housing at Brislington the same route into Bristol. Even if the new proposed road improvements are built, this will only amount to a temporary solution to a problem that requires long term, sustainable transport investment. All the statistics in the last 50 years show that increasing road space only encourages and enables more private car commuting, and new roads are filled up to over capacity within a few years (see [CPRE, 'The End of the Road: challenging the road building consensus' March 2017](#)).

KSM5, 6, 7, 8, 9 and 10.

CPRE supports these proposals.

Chapter 6 Whitchurch SDL

WCH 1 Strategic Planning framework

CPRE takes the view that all of these options are unacceptable and misconceived. It is important to retain the 'separation of settlements' that currently exists between Whitchurch and Bristol, for the benefit of Bristol residents, to retain their connection and access to local countryside, as well as for those of Whitchurch.

More fundamentally, CPRE considers that the overall housing requirement proposed by the JSP is well in excess of what is indicated by the most recent economic forecasts, and it is the JSP requirement that is driving the strategy for Whitchurch. The overall requirement should be reduced and Bristol required to provide more of its own housing rather than outsourcing it to neighbouring areas, leading to more congestion and pollution because of commuting. (for example, new plans for the old "Arena" site near Temple Meads could incorporate much more ideally located housing, and especially affordable housing and less office and hotel development, as well as more housing planned above current and future retail space.) Looking at the most up-to-date economic forecasts, CPRE believes that the maximum additional housing requirement should be 73,400, which is some 28,800 homes less than the current JSP target figure. Adopting the lower, more up-to-date figure would largely remove the need for large-scale development at the SDLs, and thus also, many of the additional congestion and pollution problems, although the existing unacceptable levels of both still require significant intervention.

WCH2 Garden City Principles

These policy options are too vague and aspirational for sensible comment to be possible at this stage but in the light of the above comments it is clearly most unlikely that the goals of a genuine “garden city” (such as has been defined in national planning policy) could possibly be achieved.

WCH3 and 3a Strategic design Objectives

CPRE has no difficulty with the general thrust of these design objectives which are in line with best practice. They do not and cannot however mitigate the unacceptable impacts of the strategic Whitchurch options currently proposed.

WCH4 Housing

Apart from the fundamental objection to the amount of housing proposed (see above) CPRE’s main concern about this policy is the lack of specificity and control over the proportion of affordable and social housing to be included. Past experience suggests that this is in the end invariably much less than that initially proposed. Ways must be found to ensure that the proportions are sufficiently high initially and are not reneged on by developers.

WCH5 and 6

No comment

WCH7 Transport

The proposals for Whitchurch are fundamentally flawed when it comes to transport provision. It is recognised in JSP transport documents that the impact of development on this scale will generate traffic that will add to congestion and pollution on local roads. It is also recognised that there is effectively no scope for improving either the road capacity or the reliability and speed of bus services from the new Whitchurch Park and Ride into the city centre. The proposed new link road connects with the adjacent schemes at Hicks Gate and Brislington which also appear unlikely to cope with additional generated traffic, let alone improve the current situation which is already unsustainable.

The harsh reality is that there is huge uncertainty as to whether:

- (a) the proposed Whitchurch transport package can be funded (it will be competing for funds with infrastructure projects across the country);
- (b) all the complex planning consents can be secured;
- (c) the skilled construction labour force will be available;
- (d) the package can even achieve its very limited aim of mitigating the effects of the JSP.

These huge flaws underline, dramatically, the folly of capitulating to Bristol’s plans to outsource its housing need (in large part for more affordable and social housing) to unsuitable outlying areas when doing so will create social, transport and environmental

issues that are in fact entirely in conflict with the “Visions” for Bristol, B&NES and the whole WECA area as set out in the overall planning documents

WCH 8,9

No comment

WCH10 Proposed Policy approach for zero carbon

As present proposed policies stand this statement is clearly unachievable, and not improved by the approach shown above.

WCH11 Relocation of Brislington Park and Ride

CPRE recognises some merit in using the existing Park and Ride site for housing (it is marginally nearer the city). However relocating the P&R site will be inadequate in reducing the amount of traffic using the A4 between Bath and Bristol, and will do nothing to solve the traffic congestion and pollution problems in the whole Bristol and Whitchurch south-east “quadrant”. This corridor needs to become a first priority for improved public transport investment.

SOM1 Policy approach for Somer Valley Enterprise Zone

CPRE broadly supports the strategy for the Somer Valley, recognising that it is, outside the Green Belt and that the case for a better mix of industrial/employment and residential development is economically desirable. However, the unacceptable and growing levels of congestion and delay on all routes into Bath and Bristol require early investment in alternative transport options, such as Park and Ride within the Somer Valley area.

SOM2 and 3

No comment

Chapter 8 Development Management

DM1 Emerging Policy approach for carbon reduction

CPRE broadly supports this approach whilst repeating that the overall proposals are such that the approach is almost certainly unachievable without major changes to the overall strategy.

DM2 Emerging policy approach for harnessing wind energy

CPRE supports this approach subject to strict compliance with the stated objectives for minimising impact.

DM3 – DM 15

No comment

DM16 Emerging policy for electric vehicles infrastructure

CPRE supports this policy and looks forward to it being developed further.

DM17

No comment.