

Further Statement to West of England Joint Spatial Plan, Examination in Public

CPRE Avonside response

Matter 2: Strategic Development Locations and Green Belt Exceptional Circumstances - Overarching issues and the Relationship between the JSP and Local Plans

Introduction and overview of previous submissions

1. In our previous submissions CPRE Avonside has argued that:
 - i. The scale and number of Strategic Development Locations (SDLs) are excessive because of the overstatement of the future housing requirement and employment forecasts.
 - ii. The location of many of the SDLs is deeply flawed in terms of the over-arching requirement for “sustainability” because so many of the SDLs are located a significant distance from Bristol - the housing market area which development will primarily serve. The primary consequence of this will be an increase in car dependence and consequent pollution and congestion - with all the economic and human costs that these entail.
 - iii. Other SDLs are also unsustainable because even if they are closer to Bristol, it is almost certainly impossible to provide the necessary upgrades to public transport, and they invariably cause unacceptable damage to local landscape, character and amenity.
 - iv. The use of Green Belt land by a number of the SDLs is unacceptable because no adequate case demonstrating “exceptional circumstances” has been laid out, there has been no adequate and wholesale review of the Avon Green Belt, and there is no robust approach requiring and ensuring the use of brownfield land first.
2. These arguments have all been reinforced by the following events and information that has been steadily emerging since the last round of submissions.

Downturn in Economic Forecasts

3. Economic forecasts have increasingly clearly shown that growth over the plan period is likely to be significantly lower than at the time of publication of the original Joint Spatial Plan (JSP). This is clear from the most up-to-date figures from the Office for National Statistics (ONS), which should be the basis for the plan, rather than earlier forecasts. ONS forecasts are broadly confirmed by forecasts from the Bank of England and independent authorities.

Greater emphasis on need to tackle the effects of local pollution and climate change

4. At both national and local level, the last 12 months have seen much greater emphasis placed both on both the negative health effects of local pollution and the urgent need to avert the potential catastrophe of climate change. The projections (such as they are) for pollution contained in the supporting transport documents and in the wider Joint Local Transport Plan 4 (JLTP4) for the West of England, themselves show that, even on the most optimistic reading, congestion and pollution across the sub-region can only be expected to remain broadly the same as they are now. CPRE believes that the current JLTP4 is far from adequate and, in reality, even the very limited goal of “mitigating” the effects of the JSP is extremely unlikely to be achieved (see our further comments in paras 7-8 below).
5. Given the scale of the problems in this regard already faced by Bristol and Bath and by some communities on main routes serving both cities, it is essential that the siting of new developments is re-thought in order to ensure that the over-arching “sustainability” requirement is genuinely met, and that a robust attempt is made to prioritise the most sustainable sites (urban, suitable brownfield) and the delivery of affordable housing.

Premature reviewing of Local Plans

6. A number of the local authorities involved in the JSP have recently published and consulted on their draft Local Plans. CPRE Avonside objects very strongly to this premature step for the following reasons:
 - i. Moving ahead with Local Plans before a decision has been reached about the JSP inevitably implies the assumption that the great majority of proposals in the JSP will be agreed and can therefore be taken as a “given”. This is both improper and prejudicial to the JSP discussions and Inquiry. We believe, unfortunately, that developers are already treating inclusion of SDL locations as a de facto approval of a number of sites.
 - ii. There is an anomaly in respect of the NPPF. The JSP is being assessed against NPPF 2012, whereas Local Plans are being assessed against NPPF 2018. This opens up the possibility that some sites and proposals might be accepted in the context of the JSP Examination but then be found to be contrary to the criteria in NPPF 2018.

- iii. A specific anomaly arises in the case of Bristol's Local Plan, which is the most recent to be put out for consultation, and to which CPRE Avonside has responded in detail. The plan envisages building more houses than the number allocated to Bristol in the JSP. However, a key justification for needing to locate housing serving the Bristol HMA outside the city boundaries has always been that Bristol did not have space to build more. The Local Plan consultation confirms that is apparently not the case, so the justification for at least part of the housing outside the city is self-evidently now weakened.

Failure to Integrate Adequate Transport Planning

7. There are major issues arising from the development of the Joint Transport Plan through a separate process and separate institutional arrangements. The most recent and comprehensive articulation of the transport plan is in JLTP4, which is not in fact on the list of documents for the JSP Examination. However, it has always been understood that much of the JSP would be heavily dependent on the ability to provide the necessary level of supporting upgrading of transport infrastructure and services. The JLTP4 reveals the extent to which this is now most unlikely to be achievable because:
 - i. There is an acknowledged "funding gap" of some £6 billion which it is very hard to see being filled, given wider economic circumstances.
 - ii. Even where money might be found for schemes, some of the land assembly and planning obstacles are such that it would be years before schemes could be implemented, if at all.
 - iii. For most of the SDLs, virtually no significant upgrading of transport infrastructure is envisaged, which means that largely car dependent communities will be adding journeys, often at peak times, to road systems already operating well above maximum capacity and beyond legal levels of air pollution.
 - iv. For other SDLs, the transport plans openly acknowledge that it is physically and geographically impossible to create the conditions which would enable improved public transport to operate effectively.
8. The level of uncertainty surrounding the deliverability of many key components of the transport "plan" seriously undermines undertakings given at earlier stages that development would not be approved or go ahead unless and until the necessary transport improvements had been approved and completed. Leaving many of the key SDL related transport improvements to "evolve", and subject to "additional policy guidance as detailed assessment and master-planning takes place" is completely unsatisfactory. It leaves open the very real possibility - probability - that many of the transportation projects will never be realised. That will have

disastrous consequences for pollution, congestion, economic growth and general quality life as well as being a breach of trust.

Failure to demonstrate ‘exceptional circumstances’ for removing Green Belt land

9. As regards the Green Belt, CPRE continues to hold the view that the JSP fails to demonstrate the required “exceptional circumstances” for taking Green Belt land. We would also strongly argue that whatever the conclusions of the JSP Inquiry, it should not then still be possible for the local authorities to propose any additional alterations to the Green Belt. The Green Belt has been hugely successful not least because it has not been open to constant amendment and creeping encroachment. As a matter of principle, and to maintain public trust, that needs to remain the case.

Conclusions

10. In summary, therefore, CPRE believes that emerging information and developments since the last round of JSP submissions amply justify our previous concerns, which have in no way been met or satisfactorily answered. The scale of the SDL’s is excessive, the locations are largely unsustainable, the supporting transport improvements are in many respects unachievable, and the use of Green Belt land has not been shown to meet the “exceptional circumstances” criterion required by national policy.

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