

SHAPING BRISTOL OVER THE NEXT 20 YEARS THE KEY ISSUES FOR BRISTOL'S DEVELOPMENT FRAMEWORK CORE STRATEGY

RESPONSE OF BRISTOL CIVIC SOCIETY AND LA21 LAND USE GROUP

A shorter list of key spatial issues:

1. Meet the demand for new housing without increasing the need to travel.
2. Satisfy housing demand before building in the green belt
3. Create population centres that attract people and minimise the need to travel.
4. Create physical environments of local character.
5. Create the conditions for economic growth in centres with capacity for employment growth.
6. Plan land use and public transport to reduce traffic congestion and to improve air quality.

INTRODUCTION – this response's paragraphs follow "Shaping Bristol's" paragraphs.

1.3 The Issues Paper

"Shaping Bristol" asks "What changes does Bristol need to make it economically successful and a pleasant city in which to live during the course of the next 20 years?" The City could have produced a more useful response if "Shaping Bristol" graded the priority of the 16 Core Issues. Without this, we doubt whether a tick-box questionnaire can produce a useful response to the consultation. We welcome consultation. Although we regret that the process to adopt the core strategy appears to have slipped by 12 months, this gives the City a longer period for consultation to produce a sound Core Strategy.

2 Vision for an emerging Core Strategy for Bristol

2.1 The local context

"Shaping Bristol" reflects the published objectives of the Bristol Partnership. Does Bristol intend to build on the good practices set out in "Local Development Frameworks - Delivering the Vision" promoted by the Planning Advisory Service?

2.2 Regional and sub-regional context

The need for the scale of growth that requires urban extensions and/or green belt incursions is based on assumptions of economic and population growth, which may not reach the predicted levels over the plan period of the next 20 years. The forecast

of the need to build 25,000 extra homes a year depends on the assumption that there will be sustained economic growth, irrespective of the effect of the increase in oil and resources prices, and that the rapid decrease in household size will continue. What happens when oil reaches \$100 a barrel? The City's evidence shows that 55% of dwellings are currently in single occupation. Will the proportion in single occupation continue to increase, substantially? Our response to Issue 1 shows how the City can monitor its housing need and manage the available development land without attempting to plan for a housing need that is externally predicted in the Regional Spatial Strategy (RSS).

2.4 Evidence and information

There are several ways in which the evidence base that is required to make the Core Strategy sound is not yet adequate:

- “Shaping Bristol” says that in the public consultation on the last Local Plan, the City received over 3,000 responses. The consultation was reported to the Cabinet in June 2004. Those who responded do not know whether their views affected the plan, and this is as important as any other factor.
- Appendix 1 refers to surveys. There is no analysis of previous plans to show which policies have been successful and which policies have not performed as well as was expected and require reconsideration. Lessons from previous plans are an essential part of the evidence base to make future plans.
- “Shaping Bristol” does not state whether survey data makes any policy mandatory for the City or merely observes a trend that gives the City a choice of policy. The policy that requires improved air quality in central Bristol, are an example.
- No evidence is given of the performance of particular planning policies. The public needs to know the relative performance of their City measure against other cities that are comparable to Bristol. For example, in other cities, what percentage of new residential development is social housing?

We understand that this Issues stage is intended to put finite limits on the range of options that need to be considered in the next stage of the process. However, the weakness of the evidence presented does mean that the next stages of the process of creating a Core Strategy must leave open the reasonable opportunity for the public to add to or reject Issues. We, in common with many other community groups will want the reasonable opportunity to add to or argue against particular issues at later stages of the process.

2.5 Community/Stakeholder involvement

We responded to the before the “Core Strategy Sustainability Appraisal – Scoping Report” consultation, to which Appendix 3 refers. Page 32 “Shaping Bristol” says “Sustainability objectives have been agreed with the Regional Planning Body and are available on its website.” The City did not publish the consultation's conclusions to those who responded to its request for comment. We do not know what issues the public identified or whether the respondents' views affected the sustainability objectives.

3 Key Issues

Staffordshire’s core strategy was found to be unsound because, among other reasons, it was:

- too generalised,
- not sufficiently spatial-specific,
- not sufficiently local specific.

It is important for Bristol not repeat Staffordshire’s mistake. The requirements of The “Soundness Test” defined by PPS 12 at paragraph 2.24 are specific.

The conformity tests

Does the City intend to redraft its Statement of Community Involvement Community involvement to comply with the PPS 12 - Paragraph 2.24 or to follow the minimum regulations on consultation?

The statement is central to the production of all the Development Planning Documents. The City Council has the advantage of examples of approved Statements of Community Involvement adopted by other planning authorities.

The coherence tests

We suggest the following shorter list of key spatial issues:

1. Meet the demand for new housing without increasing the need to travel
2. Satisfy housing demand before building in the green belt
3. Create population centres that attract people and minimise the need to travel
4. Create physical environments of local character
5. Create the conditions for economic growth in centres with capacity for employment growth
6. Plan land use and public transport to reduce traffic congestion and to improve air quality.

The table of destinations on page 5 allocates the 16 key issues to the shorter list.

The Coherence, consistency and effectiveness tests

Joined-up thinking

1. Effective joint planning between the City’s departments
2. Effective joint planning between the four Greater Bristol unitary authorities
3. Linking with the community strategy

The Core Strategy is so wide-ranging that joined-up thinking is essential. The advantage of being at the start of the process of strategy development is that there is time to set up the frameworks to achieve it. The City should produce these plans:

Joined-up thinking (1) - Effective joint planning between the City’s departments

We welcome the proposals in “Balanced and Sustainable Communities” to deliver the City’s policies approved by the Cabinet on the 9th November 2006. We approve of the establishment of cross-departmental corporate delivery teams and the community involvement proposals.

Joined-up thinking (2) linking with the community strategy

It is important that the core strategy is written so that the links with the community strategy are clear: this means that the structures of the two documents must inter-relate. Is there a case to make them a single publication which keeps spatial policy distinct, whilst integrating other policies?

Joined-up thinking (3) - Effective joint planning between the four unitary authorities that govern Greater Bristol

Greater Bristol is a single built-up area that shares a common economy and social infrastructure. Co-operation between the four unitary authorities is necessary to enable all of the authorities' to deliver the policies of their respective Local Development Frameworks. Many centres of employment and growth, such as Kingswood, overlap the boundaries of the unitary authorities. The West of England Partnership exists to promote co-ordinated thinking. We are not clear how effective it is. It should be more effective. The City and its neighbouring authorities must ensure the coalescence of their overall effort for the benefit of the whole of the sub-region.

Partnerships ensure the best return from the sale of land in public ownership.

Overarching issue

Economic objectives cannot be pursued to the detriment of sustainability issues.

Conflicts will involve the balance between economic activity and the environmental and resource impact of development.

The Core Strategy must define what it means by "sustainability", which must include a check list to resolve the balance between economic gain and wider public benefits such as improved urban design and improved architecture.

We support "Shaping Bristol's emphasis upon the local economy and the development of centres of employment and growth in the context of the improvement of the City's level of sustainability.

We believe that the principal planning conflicts over the next 20 years will involve the balance between economic activity and the environmental and resource impact of development. To provide a framework to resolve these conflicts the Core Strategy must define what it means by "sustainability". The options paper must include a check list for the City to apply to decide every proposal that involves the balance of economic gain and wider public benefits such as improved urban design.

Economic objectives should not be pursued to the detriment of sustainability issues.

Social Issues

We support the iterative approach of 'plan, monitor, and manage', not to 'predict and provide'. We accept the projections of housing growth on this basis subject to our comments at paragraph 2.1 and our comments at Issue 1 below about protection of the green belt.

Bristol Core Strategy: list of issues from the November 2006 issues paper

	Issue	Spatial aspect
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SOCIAL

1	Having enough homes to meet current and projected population need	Land use for distribution of new housing
2	Having enough affordable homes to meet current and future needs	Land use for distribution of new housing
3	Ensuring provision of high quality and successful local services, facilities and centres	Development near centres
4	Providing the environment for healthy living	Open spaces, healthy environment, access to services

ECONOMIC

5	Providing for the land use demands of a thriving economy	Land use for employment
6	Providing employment opportunities in the deprived areas of the city	Areas with capacity for employment growth
7	Improving transport movement and accessibility	Access to services, development near centres
8	Enabling development in leisure, sport, art and tourism	Access to services
9	Promoting regeneration and renewal initiatives across the city	Areas with capacity for housing, access to services, physical environment

ENVIRONMENTAL/PHYSICAL

10	Protecting and enhancing Bristol's historic environment and ensuring high quality sustainable urban design and construction	Physical environment
11	Protecting and enhancing the natural environment	Physical environment
12	Tackling climate change	Building design, access to services, development near centres
13	Reducing pollution	Access to services, development near centres
14	Providing for sustainable waste management	Building design
15	Effective water management and flood protection	Location of development
16	Improving the streetscape and making attractive and better places and spaces	Urban design

SPECIFIC ISSUES

Issue 1 – Enough homes

Protecting our green belt

If the City allows urban extensions straight away, it will deflect money and energy from the urban regeneration programme.

Future generations will regret a policy that permits the immediate loss of green belt and allows further urban sprawl if the economists' growth assumptions prove to be wrong.

The City should allow urban extensions only after all development land in the City is exhausted. This will give the City time to assess whether current housing need projections are correct.

Can the City monitor the performance of its planning policies by the introduction of key performance indicators to show whether current planning policies for housing are successful?

How far do the current policies reflect the recommendations in PPS3 to:

- ensure more efficient use of houses?
- provide a balanced approach to the housing supply? There is an excess supply of tiny 1 & 2 bed flats and no family housing in the City Centre.

Future generations will regret a policy that permits the immediate loss of green belt to further urban development if the economic assumptions prove to be too optimistic.

Will migration, which underpins the high growth target, continue? Will the size of household, continue to reduce? ? The City can monitor its housing need and manage the available development land without releasing green belt land for housing at once.

If the City permits urban extensions immediately, it will deflect money and energy from the urban regeneration programme such as the south Bristol C21 initiative. Private capital is essential to the City's housing policy. Volume house builders will always choose a green site because an urban site is more demanding and less profitable. The City must recognise the change of culture that the Stern Report reflects. Green belt development will generate additional car journeys.

Next summer's Options Paper must say that within the early years of the plan, the City will concentrate on urban regeneration. An annual assessment of the demand for houses and the supply of development land within the City will be the best test of the RSS, projection of population growth. If the Government's economic projections prove correct, there is the option to permit development in the green belt, sequential to urban regeneration. Urban extension should be permitted only after the practical exhaustion of urban regeneration opportunities.

Before urban extensions into green belt are permitted, the public will expect an examination of each site, with a detailed environmental assessment, particulars of the appropriate infrastructure and green belt replacement. There are a number of local examples of modern, large, single use housing estates, where the travel needs of the residents are heavily car dependent because the supporting infrastructure has never been provided. The story of Hartcliffe over the last 40-50 years is one which demonstrates what happens to a community when it is cut off from centres of employment and leisure.

If the assumptions for growth and the increase of smaller households are not borne out, the need for urban extensions can be re-assessed.

Issue 2 – Enough affordable homes

Does the City not achieve its current 30% target for the proportion of affordable new homes? Are key performance indicators published? If the affordable homes target is not met, why is this? Should the City follow other planning authorities and use lower thresholds than the Government Guidance?

Issue 3 – Provision of local services

What are the section 106 thresholds and requirements? Can the public be told the amount of s. 106 money used to enhance Bedminster? Should the threshold for section 106 contributions be lowered to make new development contribute more to wider community costs?

Issue 4 - Providing land use for healthy living

“Shaping Bristol” could usefully make use of the research and Commission for Architecture and the Built Environment (CABE) guidance on the difficulty of designing a physical environment to promote health living directly. There should be a cross-reference to health and recreation policies because the issue is more about health and recreation policies than it is about spatial policy.

“Shaping Bristol” should say how the City will protect open space across the city, so that open areas that provide a welcome open space within intense urban surroundings do not become semi-derelict. Maintenance, particularly of small and informal areas is as important as the provision of land.

To achieve “Shaping Bristol’s” aspiration there must be an early assessment of the parks, sports land and the many informal open spaces, which are important to local communities. The public will support the City if it effects CABE recommended policies. The Core Strategy must propose a policy to maintain mature trees.

Issue 5 - Providing land for business use

We believe that employment land is going to housing at an excessive rate, which is not sustainable. The loss of local jobs creates longer term transport movements and will not reduce the need to travel. We suggest

- The early assessment to protect industrial land and local jobs.
- A priority list of pressure areas to give a better chance to regenerate urban villages that are centres of employment and growth.

It is not enough to allocate land for business use. There must be a cross-reference to training and regeneration policies.

Bristol Airport is not a regeneration opportunity. There is a monopoly of car parking, taxis and buses. It has poor public transport access.

Expansion of Bristol Port into the Gordano Valley will be harmful.

Issue 6 – Providing employment opportunities in deprived areas

Shaping Bristol” should define these deprived areas.

This is as much about training and regeneration policies as it is spatial policy. Allocating land cannot by itself create job growth.

Issue 7 – Improving transport and movement

The Final Joint Local Transport Plan said “Bristol is one of the most highly congested cities in the country.....Robust measures need to be introduced to reduce car use...”. Next summer’s Options paper must define the elements of “robust measures”, which include:

1. The recognition that attempts over the past 40 years have failed to produce an effective transport policy for Greater Bristol. The Joint Local Transport Plan has not worked well. Its policies are bus based. First Bus has market dominance. The public continually complains about poor bus punctuality and expensive fares. These compare unfavourably with the services provided in other cities. Each year overall passenger miles reduce. There appears to be no alternative plan for a mass passenger transport system around Bristol’s dispersed residential areas.

Lack of an effective transport policy

Over the past 40 years Greater Bristol has not had an effective transport policy.

Bristol needs an alternative mass passenger system, not a buses only policy.

In the central wards, to reduce traffic congestion and air pollution requires urgent political decisions and imaginative solutions.

Greater Bristol needs a Regional Passenger Transport Authority with statutory powers which other metropolitan regions enjoy.

2. The central wards are overwhelmed by parked cars, which dominate the street scene and frequently obstruct the emergency services and waste collection. The air quality in these wards is often poor. Other cities have introduced controlled parking, and more traffic exclusion or limitation schemes than Bristol has introduced. Where these schemes succeed they improve safety, which encourages pedestrians and cyclists. They increase the use of public transport and improve air quality. They reduce congestion and improve the appearance of streets.

3. Funding options to secure investment in public transport must be discussed. Will the sub-region offer to pilot workplace parking charges to subsidise public transport to allow a better balance between say, the Cribbs Regional Shopping Centre and Broadmead? This is a cheaper option to congestion charging, which might blight the City Centre to the advantage of out of town centres.
4. It will require political courage to re-evaluate the need to build the South Bristol ring road. Road capacity should not be increased until other measures are actually in place and working to ensure that road capacity increases do not

induce more traffic and car dependence. Selective additional highway capacity will encourage more car use. If the South Bristol Ring Road is built without a corresponding reduction in road capacity in Bristol, it will cause more traffic, congestion, and pollution and contravene the policy statements in Section 1 of the draft Regional Spatial Strategy. The Department for Transport's National Shared Priorities does not name the South Bristol Ring Road as a priority or in any list of measures. "Shaping Bristol" must:

- *The aim to reduce traffic as a whole rather than just reducing the rate at which traffic increases.*
- *The need to review road improvements that run counter to the aim of reducing the need/desire to travel by car.*

Issue 5 appears to deal with transport under the heading of economic development and suggests more road space. It fails to consider any alternative.

Issue 7 implies that the economic and environmental problem in Bristol is road congestion, which will be solved by creating more road space by road building and/or road pricing. We strongly disagree with these views.

Issue 8 – Enabling the development of leisure, sport, art and tourism

Bristol needs to make its suburbs into attractive urban villages where residents can work and live and save the need to make car journeys.

Higher densities do not have to involve high rise. Planning can provide mixed use development.

Architecture can rediscover the use of traditional forms that use mixed heights, pedestrian squares and arcades.

Attractive development aims are:

- higher standards of energy efficiency
- improved amenity and privacy
- high quality design

There should be a cross-reference to other relevant policies. "Shaping Bristol" must stress the importance of accessibility and the difficulty of funding the investment necessary to provide mass passenger transport to major sporting and leisure developments. The proposed development of the Memorial Stadium in Horfield is an outstanding example of the problem.

Issue 9 – Promoting regeneration and renewal

Some recent development are of good quality but there are many examples of uPVC frames within square windows, blank flat stretcher bond brick walls and ground level parking. Too often development is over intensive. Recent development in the City centre is an example. There is a concentration of small, often tiny apartments, which do not achieve the housing mix that PPS 3 recommends.

The challenge is to increase the density in regeneration areas by good quality development. Attractive development aims at:

- higher standards of energy efficiency than the normal social housing model,
- improved amenity and privacy standards,
- high quality design.
- active street frontages to encourage civic pride and discourage anti-social behaviour. Dead parking grills along extensive street lengths encourage opposition to more intensive development.

To achieve reasoned consultation the public must be given visual aids to understand any large scale project. There is a legacy of poor architectural design. The public must be reassured that high density does not involve high rise, Good architecture will include the return to more traditional architecture that the public sees in other British cities and on the Continent. It will have mixed use, mixed heights and pedestrian squares and arcades. Examples of good urban development are illustrated in “Towards good practice in sustainable urban land use” published by the LA21 Land Group and adopted by the ODMP. The research was funded by a grant from the City.

Issue 10 – Protecting and enhancing Bristol’s historic environment and ensuring high quality urban design

Only 50% of Bristol residents say that they are satisfied with the appearance of the build environment.

There is:

- widespread cynicism about any development proposal.
- a legacy of poor spatial and architecture
- a widespread perception that economic objectives will override urban design and architectural quality.

Bristol needs to:

- Listen to what its residents say about their surroundings
- Accept that it is impossible to build free-flow traffic flow and plan for a City Centre where the pedestrian’s quality of life comes first.
- Commission an urban design assessment of the City Centre to improve the urban design and raise the public’s expectations of architecture.
- Give Bristol a City worthy of its reputation as a metropolis and regional centre.

At page 32, “Shaping Bristol” says that only 50% of Bristol residents say that they are satisfied with the appearance of the build environment. There is widespread cynicism about any development proposal. There is a legacy of poor spatial planning and poor architecture. There is a widespread perception that the City will always consent to the developer’s plans and fail to balance economic objectives against other considerations such as urban design and architectural quality. This widely held view may possibly be unfair but it represents the climate of opinion. These recent developments encourage this negative view.

- Canon’s Marsh: after prolonged, active public consultation, plans were approved, which preserved views of the Cathedral from the south. The developer was permitted to change the publicly accepted design. The views of the Cathedral across the harbour were blocked and lost and the viewer, sees only the brise solaire, which resembles a giant cheese grater. Naively, at page 24, “Shaping Bristol” includes a photograph of the side of the building whose design is widely condemned.

- Wapping Dock: despite widespread objections, new buildings are permitted whose height will dominate the SS Great Britain. These examples are both historic and visually sensitive sites.

“Shaping Bristol” speaks of the City’s legibility. The changes to the centre and other landmarks within the City have occurred in an unplanned manner, which is at odds with an effective spatial vision. The height of the new development in the docks basin and the Broadmead extension will harm Bristol’s essence. Over-high development takes place without a relationship to the historic context. It flattens the

topography. There will be no views of church spires. The contrast with Brandon Hill and the University Tower will be lost. The Tall Buildings Special Planning Document fails adequately to reflect the quality of urban design to which “Shaping Bristol” aspires.

The City should use the new planning system to attempt to reverse its citizens’ disenchantment with planning and architecture. “Shaping Bristol” must propose an Urban Design assessment of the City Centre to ensure the topography and landmarks are protected & enhanced. Bristol has become the leading economic centre of the South West. This is a position of strength. The City has the opportunity to consolidate its role as the regional capital. The City must re-assess the quality of the public realm in central Bristol to do justice to its aspirations. The 1960’s belief that it is possible to build free-flow has proved to be unachievable. Sustainability concerns give the City the opportunity to reconsider the Centre’s long-term future. The Options paper should include these proposals for the City centre:

- The needs of the pedestrian should take precedence over wheeled traffic.
- Public transport should have priority over the private car.
- The City should re-assess its resources to achieve improved urban design and architecture.

We support the policies described in “Shaping Bristol’s” to encourage growth in suburban centres. We suggest that each “urban village” has a design assessment. In suburban areas, 6 to 8 story buildings have been built without an effective spatial or design vision and dominate 2 or 3 storey areas. We reinforce what was said in response to Issue 9. Higher density does not necessarily involve high buildings.

Issue12 - Tackling climate change

Please see the response to Issue 7.

It is difficult to reconcile “Shaping Bristol’s sustainable ambitions with its support of

- Bristol International Airport’s expansion;
- The port’s expansion into the Gordano Valley. What alternatives might be considered at Avonmouth?
- The South Ring Road.

Issue 13 - Reducing pollution and

Issue 14 - Providing for sustainable waste management

“Shaping Bristol” should state whether an adequate refuse and recycling storage area will be a pre-condition of development permission, including permission to convert a single building to multiple occupation. Some planning authorities have adopted policy to refuse permission unless the development contains adequate waste storage. Does the City propose to impose conditions on the generators of refuse, such as supermarkets, to reduce waste?

Fortnightly waste collection was introduced without consultation. Areas of multi occupation and terraced houses are transformed into wheelie bin city. One department appears to have solved its problems with a policy that creates a problem for a different department and which contradicts the objectives included in “Shaping Bristol” and degrades the street scene. The public make comparisons with other cities

that have introduced successful recycling policies without a litter of assorted refuse bins.

Issue 15 - Effective water management & flood protection

“Shaping Bristol” should examine these issues:

- The wider strategy required to reduce flood risk to assist the City to meet its housing targets.
- Whether the City proposes new water collection storage policies, particularly in new development.
- The proposal to build a Severn Barrage.

Issue 16 - Improving the streetscape & making places & spaces

Please see the response to Issue 4 and Issue 7. Guidance is required to tackle the current over-design of many highway infrastructure works and excessive signage. Does the City propose to publish a “Public Realm” SPD to ensure that “Shaping Bristol’s” aspirations are translated into minimum design requirements linked to clear guidance?

Next steps

The Bristol City Council should:

- 1 Comply with PPS12 and publish a Statement of Community Involvement to achieve more than a minimum community involvement that the regulations require.
- 2 Publish the results of the February 2006 Sustainability Appraisal Scoping Report consultation. We made proposals for sustainability objectives, improvements to the methodology and plans for future community involvement in the scope of appraisal method, objectives and options.
- 3 Publish a shorter list of key spatial issues and an interim draft(s) of the Options paper before next summer to improve public consultation.
- 4 Distinguish in future consultation papers, between mandatory, National or Regional policies and issues where the City has discretion and choice.
- 5 Meet with us and other organisations who can partner the City Council to make its public consultation more effective and to enable it to profit from skills available in the community.

Next Steps
To make publication consultation effective the City must
Publish the result of all public consultations and say how the public response has influenced its policies
Publish its Statement of Community Involvement without delay to comply with Planning Policy Statement 12.
To profit from skills available in the community, publish a work in progress, interim options paper to give the maximum opportunity for consultation.
Arrange a structure to meet all organisations that can partner the City to achieve the worthy aspirations that “Shaping Bristol” describes.