

Redland & Cotham Amenities Society

Affiliated to the Civic Trust - Registered Charity No. 268848

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BRISTOL'S DEVELOPMENT FRAMEWORK CORE STRATEGY

Consultation response by the Planning Group, Redland & Cotham Amenities Society

December 2006

INTRODUCTION

The Society's members are obviously affected by all the Issues listed but we will concentrate on those that we consider are particularly relevant to our area. Like many other parts of Bristol our area is not in need of regeneration beyond that arising from the normal process of renewal. We recognise our relative good fortune, and understand the focus on parts of Bristol which need renewal. However, at the same time successful environments throughout the city must be protected and enhanced as organic change takes place.

THE CONSULTATION

1. We remain to be convinced that the Council understands and is committed to meaningful and timely consultation. In our view this requires engagement and working with citizens, not the seeking of comment on proposals.
2. We regret that this and other planning consultations are taking place before an amended SCI has been published, let alone adopted. The form of this Consultation reinforces our concern. Why is the 12 weeks agreed between Council and Bristol Partnership not being allowed? 6 weeks is not enough to consider and respond to a document that requires the reading of many related documents and discussion with colleagues and Society members.
3. The Questionnaire is flawed. It does not provide for response to each Issue, nor even ask for the 16 Issues to be rated. It seems to have been designed to enable ticks in boxes to be counted. This document therefore constitutes the Society's response.
4. We do not fully understand the structure of the reorganised planning system but are surprised that various SPD have been completed before the Core Issues were drafted.
5. We see the Core Issues document as useful in indicating to some extent the current thinking of the Planning Department on matters that particularly concern us. It is difficult for us to consider core issues without also considering how they will be implemented. Our comments therefore include suggestions extending into implementation.
6. We have no particular comment on the way the Core Strategy has been split into 16 issues. Together they seem broad enough to cover all matters that need to be in a Core Strategy. We have made no comment on many issues, focussing on those where we have experience or are of particularly relevant to our area.

GENERAL COMMENTS

1.1 The Bristol Development Framework

We presume it is Government that has decreed that, growth being 'a good thing', Bristol should plan for homes and services for a population increase of 7.5% and enable the provision of another 60,000 jobs over the next 20 years.

The City Council appears also to favour this predict and provide approach, presumably sharing the 'bigger is better' philosophy. Have Bristol citizens been asked if they want this expansion? Have they been warned about the physical (including spatial) consequences?

We accept that some increase in population and employment opportunities can be used to help the necessary regeneration of some parts of the city. However, in many parts of the city including ours anything more than minor increases are likely to damage the built and natural environment, and thus the quality of life.

2.1 'The Bristol Partnership' (Local Strategic Partnership). We note that the membership of this influential body appears to include no representative(s) of 'ordinary residents', only those representing specific communities or projects.

The LSP 'Community Strategy' aims that are quoted include being a 'city that realises its full potential and exerts influence appropriate to its status at the regional, national and European level.' We cannot see that 'exerting influence' has any place in Core Strategy and spatial planning.

We also note the aim for 'A high quality environment - Bristol to be a green capital in Europe, tackling the causes of climate change and creating a clean and attractive built and natural environment'.

We welcome this statement though believe that to achieve 'green capital' status from its present position and present policies Bristol will have to be far more imaginative, pro-active and indeed draconian in its approach to all aspects of environmental sustainability.

COMMENTS ON SELECTED ISSUES

Extracts from Issues Paper - normal type.

RCAS comments in italics

2.3 Evidence and information

Outstanding evidence includes:

Parks and Green Spaces Strategy, including open space audits.

Housing Studies

Comment. This information is extremely important, and we trust that the full research will be available for public consideration. The Society's experience suggests that the parks aspect of Leisure Services is not given adequate status or resource allocation by the Council.

With regard to Housing Data we feel it is essential that the extent of rented property, particularly for students, is fully established by survey and input by Universities. This is needed to enable policies to relate to 'mixed and balanced communities'.

3. Key Issues Sustainable Development

Ensuring a sustainable future for Bristol

Social issues

Comment – the achievement of ‘mixed and balanced communities’ is a social issue and should be listed here as item 5.

Environment/physical issues

10. Protecting and enhancing Bristol’s historic environment and ensuring high quality sustainable urban design and construction

Comment - Existing environments do not have to be ‘historic’ (in the planners’ sense of word) to deserve protecting and enhancing. There is an underlying assumption that Bristol consists of areas that are either historic, needing protection because of this, or failing, and needing to be regenerated.

Most of the city, including our area, just needs incremental change and renewal, but also respect, attention to detail and above all proper maintenance.

Core Strategy role

We welcome the commitment to ‘place Bristol’s residents at the heart of the future for Bristol’ and agree with the criteria stated. However, we are not satisfied that the Council’s approach to policy formation and decision making will result in the residents feeling they are ‘at the heart. Much greater engagement is required.

Social issues

Summary Facts and Figures

- Bristol has a large student population with upwards of 32,000 living within the local authority boundary.

Comment. This figure seems to be based on 2001 Census, but includes 16 to 18 year olds as ‘students’, which they are not in terms of housing. But increases in University student numbers since 2001 probably means 32,000 about right for the total of 18-74 year olds, the age range used for ‘students’ in the census. As commented in 2.3 research is needed to establish the percentage of students living in students houses ‘in the community’, and in which areas..

- Bristol has performed well in terms of utilising ‘brownfield’ sites for housing construction. In the last 10 years 92.6% of all new dwellings completed have been on previously developed land.

Comment. We are unclear what land 92.6% relates to. We assume that ‘brownfield’ and ‘previously developed land’ includes gardens and other open green space that have now been used for housing. Building on this can be destructive environmentally. Also, does the 92.6% include homes created by conversion of city centre office buildings? A breakdown of the figure into land categories is needed.

The affordability gap between earnings and house prices has widened significantly in recent years. The average cost of a home is now 8 times the average salary. The resulting demand for affordable homes is not currently being met through the housing market. Robust interventions are therefore required to increase supply to ensure housing choice.

Comment. Interventions should include measures to prevent wholesale loss to HMO. Despite Govt. failure to alter Use Class Orders to require planning consent to create HMO there are measures Bristol could take to start to deal with affordability and mix. .

- Bristol has 53,024 people living in the most deprived 10% of Super Output Areas (SOA's) in England and 103,707 living in the 20% most deprived. To address this problem Bristol has designated 3 priority regeneration areas; the Northern Arc (Southmead, Kingsweston, Henbury, Lockleaze, Avonmouth); Inner City/East side (Lawrence Hill, Ashley); and Central south (Windmill Hill, Filwood, Hartcliffe and Whitchurch)

Comment. There may be potential to help regenerate some SOAs with student housing.

Issue 1 Having enough homes to meet current and projected population need

The Core Strategy will set a spatial strategy for the distribution of housing and will seek to ensure that new development offers a wider range of size, type and housing tenure that encourages balanced and sustainable communities.

Comment. Balance has been planning policy for many years but rarely achieved by planning as the market rules. Many previously balanced areas have become unbalanced due to many individual conversions. New thinking is required to prevent further imbalance and redress the situation elsewhere.

- to manage the accommodation needs of transient students to avoid the harmful social and environment impacts of over concentration to the detriment of the amenities of the permanent resident population.

Comment. We greatly welcome this statement. Although the percentage of students within the adult population in Bristol, 9%, is not particularly high, 75% of these live in 9 Wards. In some SOA within these wards over 40% of adults are students. In individual streets it can be over 50%. This 'studentification' has created a lack of affordable housing for permanent residents including first time buyers. This is in addition to causing the harmful social and environmental impact quoted in Issue1, which show the loss of sustainability that can result from lack of balance.

Issue 3 Ensuring provision of high quality and successful local services, facilities and centres

The City Council is currently undertaking a citywide retail study to inform the future pattern of retailing in Bristol, encouraging neighbourhood shops, considering an appropriate citywide spatial distribution, ways of arresting decline and resisting further large out-of-centre retail stores.

Comment. It is essential that planning seeks to ensure balance in retail use in neighbourhood shopping areas by, for example, the existing Supplementary Planning Guidance (SPG) for Whiteladies Rd and Gloucester Rd which helps resist further domination by food and drink uses.

Issue 4 Providing the environment for healthy living

- high quality and accessible parks, green and open space and recreation opportunities

Comment – Our two parks and Downs highly valued but under funded in respect of maintenance and renewal. We appreciate the need of some parts of the city for funding, but this should not put at risk areas that are just outside this category, or indeed any areas.,

Issue 7 Improving transport movement and accessibility

The Joint Local Transport Plan (JLTP) and the draft Regional Spatial Strategy (RSS) set the programme and policy framework for strategic and local transport policy and projects emphasising the need for continued improvements to public transport (e.g. park and ride, bus travel) and for cyclists and pedestrians, lessening the dependence on the car. Both these plans also see a role for an effective road hierarchy in the city i.e. identifying the appropriate standards of roads for different types of traffic, including new roads.

Comment. Why is there no reference to rail travel? The Severn Beach line serves our area. It is much valued and has potential to reduce vehicular traffic in our area. .

Issue 9

Promoting regeneration and renewal initiatives across the city Environmental/physical issues

Summary Facts and Figures

- In 2005 the city as a whole produced 185,103 tonnes of waste, 87.5% of which was disposed to landfill. Whilst improvements have recently been made in the recycling and composting of waste significant improvements will need to be made to meet international, national and local targets in terms of landfilled waste and recycling/composting levels.

Comment. According to SPD5, Page 14, Bristol currently produces 1.4m tonnes waste, of which 185,000 is domestic. If this is correct, and the Core Issues statement above wrong, what is being done about the 1.2m tonnes of non domestic (industry?) waste?

- Bristol is 'living beyond its means'. Its ecological footprint in 2003 was some 191 times greater than the actual size of the city. Robust measures are required to increase our sustainability as a city.

Comment. 'Robust measures' must be across the board – reducing emissions from transport, from all buildings, new AND existing, from all activities including construction, business, manufacturing, retailing, leisure activities.

The need for every emission creating action must be questioned. For example, need to build new rather than adapt existing stock. Robust measures will have to involve coercion and compulsion. There is little sign of robustness in any policy to date.

Issue 10 Protecting and enhancing Bristol's historic environment and ensuring high quality sustainable urban design and construction

Comment – Again, implication that it is only the 'historic' to be protected and enhanced. The wording should be more inclusive.

Issue 11 Protecting and enhancing the natural environment

The Core Strategy will set the context for policies to protect and enhance the city's valuable natural resources in accordance with international, national and local guidance. New development proposals will be expected to avoid harm to important biodiversity and geological assets and incorporate features within the design of development to enhance such interests.

Comment. It does not seem to be accepted that the 'natural environment' is or should be everywhere in the city. It is not only the parks and wooded areas, but all around, in street trees, private gardens and trees, allotments, road verges etc. Planning policy should promote the preservation and increase of all areas that contain plant, bird and insect life, for the benefit of health and for 'green' reasons.

We are faced with the challenge of a changing environment and pressure from future development, much of which will be required to provide for the needs of a growing economy and population. Balancing the demands of the natural environment and the future overall sustainability of the city will require imaginative solutions.

Comment - Surely to be 'a green capital in Europe' policies must presume against the reduction of green open space and tree cover. Not just in public parks but in every area. More tree planting, use of soft as opposed to hard landscaping and the use of 'green roofs' will help biodiversity and assist with pollution control and climate change (issues 12 and 13)

Issue 12 Tackling climate change

The Core Strategy will need to help to reduce carbon emissions, promote sustainable energy solutions and respond to existing and anticipated climate change in ways that protect the environment.

Comment. The need for the measures listed here has been apparent for some time. Bristol should take the lead by making their provision planning policy, and requiring developers to show why they cannot adopt them.

The recently produced SPD5 'Sustainable Building Design and Construction' is entirely focussed on 'new' buildings. It is usually more sustainable to adapt, improve and re-use buildings. Where is there advice or policy on this subject?

Where is there encouragement for the most immediate building related action, which would make a major contribution to Tackling Climate Change – energy conservation, alternative energy installations to all Bristol's building stock?

Issue 15

Ensuring effective water management and flood protection

Climate change brings the risk of both flooding and water shortages. The Core Strategy can respond by promoting sustainable drainage measures which reduce runoff; conserve and re-use rainwater; reduce energy used in water treatment, contribute to the protection of the city's valuable watercourses and enhance biodiversity.

Comment. As for Issue 12 – for example, the SUDS recommendations already adopted via SPD5, should already be part of Development Control process. Is it?

Issue 16 Improving the streetscape and making attractive and better places and spaces

The Core Strategy will provide the vision and means to deliver better public places, spaces and streets for all.

Most people respond instinctively to the quality of streets, for instance in deciding where to live and spend their time. The environment we live in has a fundamental effect on our quality of life and there is a collective desire to enjoy safe, clean and attractive places that raise our spirits and enrich our lives. This feature of successful, attractive and welcoming places is sometimes described as an areas 'liveability'.

Comment – The appearance of streets is of great importance in our area, and we consider the maintenance and supervision/policing of them as important as physical improvements. We regard the Council's organisation of street services as critical to Issue 16.

It is essential that Highway Works are integrated into the planning system to improve design and allow public engagement in their design, for example over landscaping, tree planting, street furniture etc. The present system of Highway Notices is not adequate.

When defining streetscape, private boundaries, walls, forecourts, gardens and front elevations must also be treated as part of the scene, and planning powers used to maintain or improve these as well as the public domain.

- improvement to the physical fabric and infrastructure in our streets
- well-designed highway infrastructure works (roads, junctions, pavements etc.)
- streets and places where parents feel safe to let their children walk to school and play
- pedestrian friendly places where people feel comfortable and which are safe for all, secure, overlooked, well managed and cared for
- to minimise unsightly clutter such as excessive signage
- a variety of distinctive, social and legible places
- public art to enhance the design and experience of places, promoting regional and local culture and identity
- functional streets and spaces where traffic passing through is properly managed
- to tackle graffiti, vandalism, litter and dereliction
- attractive and welcoming parks, play areas and public spaces
- continuous promotion of environmental improvements such as the planting of street trees, quality surface treatment and lighting.

Comment – Street trees are extremely important and the present continual loss of trees must be reversed, with all losses made up and policies to increase tree stock, in streets and other public places. Firm encouragement of tree planting in front gardens is also required.

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