

Bristol Green Party response to the

Draft South West Regional Spatial Strategy

The following pages are the Greens' formal submission to the 'Examination in Public' of the draft RSS, due to be held in April 2007

Summary

P3 deals with sustainability policy SD2, suggesting why:

- There needs to be a stronger emphasis on measures to combat climate change – as it is, most of the policy is directed at adapting to it.
- The specific targets should be qualified, as they are likely to vary within the lifetime of the RSS.
- The format of the policy could be improved.

P4 suggests correcting a false definition of sustainable economic growth for Bristol

P5-P7 deal with the Ring Road, arguing that:

- A South Bristol Ring Road is not a strategic regional issue; therefore it should not be in the RSS.
- No case has been made for the road - but if it is included in the RSS it will be approved in principle by default.
- The actual impacts of the road would be bad for the region and for the local community in particular.
- The aspiration for regeneration in South Bristol can and should be achieved by other means.

P8-P9 deals with the planned large scale housing and green belt development, on the grounds that:

- The 'predict and provide' rationale for building so many more houses is flawed
- The impact of building so many houses would be counterproductive; the area would become less pleasant to live in
- The proposals are unsustainable.
- The proposals increase the imbalance between Bristol and less prosperous places within and without the region - not least the South Bristol regeneration area
- The Green Belt incursions are not justified.
- The 'economic growth' justification for development is inadequate

P10 deals with congestion charging

P11 argues against airport expansion, because

- It is unsustainable, it is in direct conflict with the spirit and letter of the RSS, and it adds impossible requirements to efforts in other sectors to combat climate change. It has adverse local environmental and 'quality of life' impacts too.

DRAFT REGIONAL SPATIAL STRATEGY (RSS)

FOR THE SOUTH WEST (SW)

Representations form for your comments

Panel Secretariat Office Use Only

Representation No:

Comment No:

Date Received:

Acknowledged:

If you wish to comment on the Draft Regional Spatial Strategy for the South West, please follow these stages:

1. Complete your details in **Section A** of Page 1 of the representations form.
2. Include your organisation/name/page number in **Section B** on Page 2 and on additional completed pages.
3. Complete a separate Page 2 of the form for each part of the Draft RSS for SW you wish to comment upon.
4. Indicate which chapter/policy/paragraph you would like to comment upon also in **Section B**.
5. Provide a short summary, give reasons for supporting/objection and set out your changes in **Section C**.
6. Email your completed forms to representations@southwesteip.co.uk by the end of the consultation period.

Additional representations forms are available from the EiP Website at www.southwesteip.co.uk or from the Panel Assistant at the Panel Secretariat Office. For any general enquiries please use the Office address below.

The Panel would prefer all responses to be typed in black and e-mailed to representations@southwesteip.co.uk - it would be helpful if your representations were submitted electronically and only once – unless requested there is no specific need to also send a hard copy response. To ensure your comments are taken into account the Panel would encourage those making representations to return, at the earliest opportunity, the completed forms to the Panel Secretary to arrive at the Panel Secretariat Office by **5.00pm on Wednesday 30 August 2006**.

Please note that all comments will be available for the public to read and therefore they cannot be treated as confidential. A summary of your comments provided on the form will be put on the EiP website in due course.

This consultation is being conducted in accordance with the 'Code of Practice on Written Consultation', issued by the Cabinet Office in November 2000. Any procedural observations or complaints about this consultation should be sent to Martin Bridgman, RSS Advisor, Office of the Deputy Prime Minister, Eland House, Bressenden Place, London SW1P 5DU.

Section A

Comments submitted by	Agent (if appropriate)
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Panel Secretariat Office

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Responses e-mail: representations@southwesteip.co.uk

Please do not return the representations forms to the South West Regional Assembly.

Signature:	Date:
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Please ensure **Section A** is completed and e-mail all your completed representations forms to the Panel Secretariat's Office by 5.00 pm on Wednesday 30 August 2006 at representations@southwesteip.co.uk

Section B
Your comments by

Organisation	Name	Page Number
Bristol Green Party		

I am **suggesting a change to** the Draft Regional Spatial Strategy for the South West (please specify)

Chapter (section): 1 **Page: 12** **Policy Reference or Paragraph Number: SD2**

Section C
Your comments on the Draft Regional Spatial Strategy for the South West

Policy Reference or Paragraph Number: SD2

Please use this space to assist the EiP Panel and other respondents by providing a short summary of your comments.

There needs to be a stronger emphasis on measures to combat climate change – as it is, most of the policy is directed at adapting to it.

The specific targets should be qualified, as they are likely to vary within the lifetime of the RSS.

The format of the policy could be improved.

Please use this space to explain to the EiP Panel why you support/oppose this particular part of the Draft RSS.

The quantitative measures of climate change, and of the reductions in emissions required to bring it to sustainable levels, are still being refined. So are the political steps required to allocate emission rights between nations . The draft RSS quotes numerical targets as if they were cast in stone – it should be flexible enough to accommodate more stringent targets as they emerge. The same targets should ‘cascade’ into local planning documents; no district should opt out on the premise that other parts of the southwest are doing the job for them.

Some of the policies in the RSS (for instance the reference to carbon neutrality in sustainable construction, Development Policy G, at Sec.3 p45) are already ahead of SD2. A strengthened SD2 could give them more legitimacy.

Please use this space to set out any changes to policy/supporting text in this part of the Draft RSS you would like to see.

1. (for clarity) Delete the second bullet point (only) so the text becomes a heading for the points that follow.
2. In bullet point 1, after “Reducing greenhouse gas emissions” replace the remaining text with “in every part of the region at least in line with the evolving national targets, currently 30% by 2026 (compared to 1990 levels)
3. Add a new bullet point 2, on the lines:
 - taking further measures as climate science and technology evolve to bring the overall impact of new development to zero.

Please ensure the name of your organisation is at the top of the page and e-mail the completed forms to the Panel Secretariat’s Office by 5.00 pm on Wednesday 30 August 2006 at representations@southwesteip.co.uk

Section B
Your comments by

Organisation	Name	Page Number
Bristol Green Party		

I am **opposing** the Draft Regional Spatial Strategy for the South West (please specify)

Chapter (section): 4 **Page: 58** **Policy Reference or Paragraph Number: 4.2.13**

Section C
Your comments on the Draft Regional Spatial Strategy for the South West

Policy Reference or Paragraph Number: 4.2.13

Please use this space to assist the EiP Panel and other respondents by providing a short summary of your comments.

1. A South Bristol Ring Road is not a strategic regional issue; therefore it should not be in the RSS.
2. No case has been made for the road - but if it is included in the RSS it will be approved in principle by default.
3. The actual impacts of the road would be bad for the region and for the local community in particular.
4. The aspiration for regeneration in South Bristol can and should be achieved by other means.

Please use this space to explain to the EiP Panel why you support/oppose this particular part of the Draft RSS.

See following sheet

Please use this space to set out any changes to policy/supporting text in this part of the Draft RSS you would like to see.

Delete the reference to the South Bristol Ring Road at the fourth bullet point. Delete the supporting reference in 4.2.12 (ie everything after 'objectives'). A similar modification would be necessary in the Implementation Programme (p21, Sec 2.4)

Please ensure the name of your organisation is at the top of the page and e-mail the completed forms to the Panel Secretariat's Office by 5.00 pm on Wednesday 30 August 2006 at representations@southwesteip.co.uk

Policy Reference or Paragraph Number: 4.2.13

1. This is not a regional issue. Rightly, this road is NOT included in the RSS Transport chapter (Section 5) because it is not a strategic issue, it is a matter for the West of England subregion. The RSS can reasonably call for the regeneration of South Bristol, for the provision of a housing quota, and (if it must) for better airport access - these all have a regional dimension - but it should be for the local community to decide how best to do it. It's inclusion in this over-arching document is premature and unnecessary.

2. No case has been made. Even now, after inclusion in the RSS, the Joint Local Transport Plan and the Greater Bristol Strategic Transport Study (GBSTS), it is still not clear what the road is supposed to achieve.

In the RSS, it's merely described as 'key infrastructure'. There's no clue what it is key to, but its position in the text hints that it's intended to make green belt development possible, improve access to an expanding airport in the south and the M4 in the north, and bring inward investment into South Bristol. But there's no supporting evidence offered.

In practice, if green belt development must go ahead, a ring road is simply going to provide the opportunity for longer travel-to-work journeys for those who choose to live there. Every one of the over-arching sustainable development policies SD1 to SD4 has clauses saying the opposite.

Improved access to Bristol International Airport to permit expansion would not require a new road, according to airport bosses themselves (verbal response to a question from Cllr Tim Kent). In any case, as the Strategic Sustainability Assessment(SSA) for the RSS points out (Appendix C, p71 and elsewhere) airport expansion is itself in conflict with overarching sustainability policies.

As for the Motorway connection, the SSA (AppC, p66) identifies a "critical inconsistency" noting it is likely "to undermine efforts elsewhere in strategy to reduce long-distance travel, increase accessibility and minimise environmental damage."

The JLTP does not offer any such reasons for road construction. It merely quotes a GBSTS claim that congestion in central Bristol would be eased - but not with enough conviction to include it in its own anti-congestion chapter!

Of course the recent Countryside Agency/CPRE/commissioned report "Beyond Transport Infrastructure" (www.countryside.gov.uk/Images/Transport%20Planning%20290606_tcm2-29709.pdf) suggests very strongly that this policy simply doesn't work and never has.

The GBSTS itself suggests (Exec. summary) that the SBRR would create "major new connections between south Bristol and the major employment areas" - which suggests that north Bristol is to provide more jobs for the south - not what 'local regeneration' usually means! If people in south Bristol are to be provided with sustainable transport to jobs outside the immediate area, it would be far better to see more emphasis on rapid transit to the city centre and beyond; in the present draft there's a brief reference to a potential Hengrove to North Fringe link, but nothing to suggest it would serve more of South Bristol and nothing to suggest it would enjoy the same priority as the Ring Road.

In short, if no-one's sure what this road is all about, much less whether it would actually fulfil expectations, it shouldn't be in the plan.

3. The adverse impacts of the SBRR.

a. The inclusion of a proposal in the RSS that is so clearly in conflict with the "sustainability principles and policies to guide the spatial strategy" (SD1, SD2, and SD3, Sec 1) sets a precedent that undermines those policies to the point that they become virtually worthless. If a South Bristol Ring Road is OK, what else might follow?

b. Local impacts of raised total traffic levels include:

- * raised ground level pollution and the health costs that go with it
- * heightened risk of road traffic accidents
- * division of communities
- * noise levels in residential areas
- * impediments to public transport, cycling, and walking

Policy Reference or Paragraph Number: 4.2.13

c. Far ranging impacts of a Ring Road and its new traffic include:

- * increases in climate change emissions at a time when they should be reducing
- * a contribution to the growth of air travel from BIA, with similar effect
- * further demands on global oil resources

d. Major road building in itself means:

- * Taking up land that can otherwise be used for leisure by local people (as most of this route already is)
- * Loss of biodiversity, with ecological and environmental costs
- * Major local disruption in the construction phase,
- * Loss of amenity (views, tranquillity etc.)
- * Planning blight prior to construction

4. Regeneration without a Ring Road

- a) Roads do not directly bring inward investment or jobs - in some instances, though not always, they will add to other key conditions that make investment attractive. There are many examples of areas where massive investment in roads has failed to bring investment - and where investment crowds into areas already overburdened by traffic.
- b) Planning policies can guide new employers to particular sites that meet their needs and the needs of the community.
- c) Other non-transport policies - for instance local education quality, the availability of a workforce nearby, local amenity, landscape, even tranquillity, can all be key attractants for investment. All these can be provided without the negative impacts (above) of a new road - in fact a road can damage these assets.
- d) There are many opportunities for improving access to South Bristol by more sustainable means. The development of Hengrove Park (including a major hospital site) will bring an opportunity for more diverse bus routes and better traffic management on the busier roads, and a better cycling/pedestrian infrastructure. It could even lead to restoration of the orbital bus route that followed the line of the proposed ring road but was cancelled due to lack of patronage!

1. Whilst clearly some housing will be needed to meet the demands of demographic change, the case for providing so many has not been made. It assumes a particular growth rate, new inward investment in job-creating enterprise on a massive scale (and availability of whatever land such enterprise might need), jobs to match, and in-migration to provide that labour. This seems to be more a leap of faith than a confident prediction - given the many variables (from divorce rates to immigration policy) it could hardly be otherwise.

Where there is a lack of confidence in forecasting, it is wise to adopt the precautionary principle, and apply far more constraints on the release of valued greenfield sites and designated Green Belt for housing.

2. The policy carries a built in assumption that large scale development is benign. However, if it swallows up other assets, if it generates still more traffic, if it imposes greater strain on public services; in short, if it lowers the quality of life of the community, then its place in the plan should be challenged. The SSA (at 4.33, p44) raises similar questions. In our view, this proposal does represent a threat to the present population, and offers nothing special to potential incomers.

3. The proposed developments are unsustainable. Policy SD1 refers to the region's disproportionate ecological footprint, and sets out to reduce it to sustainable levels. Building on this massive scale, with all the associated impacts on energy, water, raw materials, traffic, climate change emissions, soil, etc, could only increase that footprint. The two policies are in conflict.

Likewise, the major developments envisaged have nothing to show significant lessons have been learned from past mistakes made with Hartcliffe/Withywood (south Bristol) or Bradley Stoke. Integrated communities need to be created with all community needs being met - and the planning system cannot currently ensure this. This policy could, almost certainly would, create more suburban wastelands filled with cars. There is really no more than a token nod to the requirements of Policy SD4, Sustainable Communities.

4. In social and economic terms, the policy sets out to favour districts which are already at the upper end of the regional income ladder. This just doesn't make sense. It draws potential investment away from where it's needed most (for instance nearby South Bristol, or more distant impoverished parts of the peninsula, or other parts of Britain that are suffering declines in investment and out-migration). It takes the easy option - by imitating what a free market would decide in the absence of any planning system. We might ask what a planning system is for if it encourages this sort of development!

5. The withdrawal of Green Belt designation, to allow the development of new build settlements, is not only in conflict with the spirit and intention of the original designation; it clearly brings a loss of environmental quality to people living in the present 'urban fringe', who will find themselves more deeply embedded in town, further from quality countryside; and it appears to have been ill-considered, according to the assessment by Colin Buchanan and Partners earlier this year (see http://www.southwest-ra.gov.uk/media/SWRA/RSS%20Documents/Technical%20Documents/SWRA_GB_Final_Report_060206.pdf)

6. There is a lack of clarity in the justification for this housing. It rests solely on the premise of expected economic growth, and thus on a new demand for a workforce. As the SSA points out (App.C, Para 21, p70) "Emphasis on growth rather than suitability to local needs may develop an economy which relies on connectivity while providing little benefit for existing deprived and excluded communities in the area." It concludes "Employment provision should be appropriate to its setting and the skills of local population". The RSS as it stands fails to make this essential qualification.

