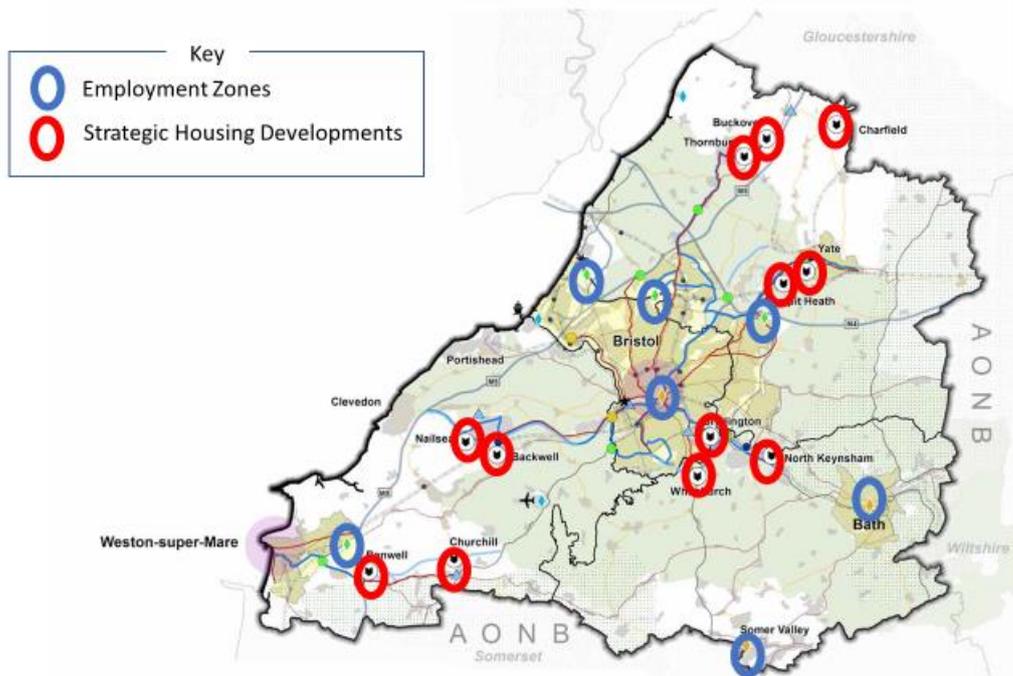


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Spatial Strategy flaw in creating satellite developments

The JSP fails the test of soundness because it fails to provide the right amount of housing in a sustainable way, contravenes the NPPF, and fails to set out the best way to meet the needs.

The proposed “Strategic Locations” for housing amounts to a policy of satellite development distantly orbiting the large centres of employment. This extends the trend towards creating dormitory towns based upon a separation of where people will work and where they live. On the Key Diagram below we have highlighted these satellite developments (in red) together with the new employment zones (in blue). This shows a random separation between the two, creating inevitable additional commuter traffic. This is particularly acute in the north of the region around the triple dormitory cluster of Thornbury / Buckover / Charfield, which is widely agreed to be particularly poorly served for non-car transport:



The inevitable outcome of this strategy is to create a step change in the already high level of commuter traffic in the affected regions and on roads between centres of employment and newly created dormitory towns, together with the associated pollution. This directly contradicts the following policies within the JSP:

- The JSP’s Vision, that “*patterns of development and transport will facilitate healthy and sustainable lifestyles*”
- Figure 3 (Critical issues and strategic priorities) – Critical issue identified that “*The form and function of development in some parts of the West of England has resulted in significant pressure on infrastructure and settlement patterns which are over-reliant on the private car*” giving a strategic priority to “*reduce greenhouse gas emissions*” and a claimed outcome from the JSP that it will result in a “*reduction in car dependency*”

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- Policy 4 (Employment land requirement) – *“The amount of employment land provided for at the Strategic Development Locations (SDLs) will respond to the amount of residential development proposed”*
- Policy 5 (Place Shaping principles):
 - Item 2 – *“Improve health and wellbeing”*
 - Item 5 – *“Mitigate and adapt to climate change”*
 - Item 7 – *“Provide and ensure access to infrastructure including public transport, which reduces reliance on use of cars”*. Chapter 4 Para 52 states that **“Strategic development should be in locations which maximise the potential to reduce the need to travel”**

The JSP therefore also contravenes the following NPPF guidelines:

- Para 17 (Core planning principles) that *“the plan should support the transition to a low carbon future in a changing climate”* and should *“contribute to conserving and enhancing the natural environment and reducing pollution”* and should *“actively manage patterns of growth to make the fullest possible use of public transport, walking and cycling,”*
- Para 124 that *“Planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas”*

It is important to note at this stage that WEJA had other options for housing growth that would have avoided much of the traffic congestion and pollution problems. As the plan has such a long time-frame it would seem appropriate to review the Green Belt in the area to see if it is fit for purpose for such a long period of time. With development pressures in the region being what they are it is an omission not to look at the appropriateness of the current Green Belt delineation to see if opportunities exist to find more appropriate areas for development that do not degrade the fundamental principles of Green Belt. This would also enhance the protection of those vulnerable areas that are susceptible to development pressure purely because they are currently outside the Green Belt. With this in mind, it would make sense to look primarily at those areas closer to the employment generators and areas of reasonable transport nodes such as Woodlands Golf course (located close to key facilities including access to Metro Bus, and within easy walking and cycling distance to the key existing employment areas at Aztec West and Almondsbury Business Park), M4 new junction, Severn Beach and Hortham.

Furthermore, with the demand for new residential development being primarily driven by the creation of new households, and with the average size of such households reducing, it would suggest that market forces would veer towards smaller housing units and thus an increase in densities. This being the case the plan should be looking for a mean density at the higher end of scale in locations close to employment development opportunities. This would suggest that the projected number of housing units in the plan period would require less land take and relieve pressure to release land inappropriately. Historically large land releases such as Bradley Stoke and Emersons Green have resulted in more units being built than the original estimates.

WEJA has **chosen** to go for commuter development as a preference to ‘selected’ Green Belt development – Green Belt sites which are more sustainable and can avoid coalescence, because they are separated from existing housing by infrastructure such as the motorway network.

However, additional pollution growth is a direct consequence of that choice. We believe that this may go beyond simple contradiction of policies, and the imposition of pollution on those affected by this policy may constitute a failure of the Authorities’ duty under the Climate Change Act 2008

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(see Chapter 4, para 48 “...objectives and provisions of the Climate Change Act 2008, 2050 Carbon neutral targets. As such, the combined West of England CO2 reduction target is to reduce absolute CO2 emissions by 50% by 2035 from a 2014 baseline”) and of the Environment Act 1995 which imposes a duty to review the air quality standard on a projected basis, which should take into account these development proposals.

Road transport is the primary source of urban air pollution and there is a clear association between long-term exposure to particulate air pollution and a reduction in life-expectancy caused by cardiovascular disease, and yet we see nothing in the JSP to assess the implication of the spatial policy on the level of commuter traffic, and the impact of increased pollution on the communities that are affected by this.

Finally, we quote from the NPPF on Plan Making, where in para 152 it states “Local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Significant adverse impacts on any of these dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued” By making the choice it has to elect to create satellite towns WEJA has failed in its environmental dimension in particular, which is described as “contributing to protecting and enhancing our natural, built and historic environment; and, as part of this, helping to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change including moving to a low carbon economy”.

Q4. Please set out what modification(s) you consider necessary to make the Joint Spatial Plan legally compliant or sound, having regard to the matter you have identified at Q3 above where this relates to soundness. (Please note that any non-compliance with the duty to co-operate is incapable of modification at Examination.) You will need to say why this change will make the Joint Spatial Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible:

The spatial strategy in relation to Strategic Locations is unsound to the extent that it cannot be fixed with simple modifications to the wording. WEJA should be required to completely re-evaluate Policies 2 and 7. This should start with a thorough review of the Green Belt to see if it is fit for purpose, with the aim of achieving two things:

1. Ascertain where land currently designated as Green Belt is not serving the purpose it was originally created for (e.g. because other factors such as motorway networks would prevent coalescence with existing developments, and / or because the land is not of special environmental value), but can be utilised to create a density of homes suitable for urban living within close proximity to areas of employment growth and / or could be easily served by public transport to an extent that it would create a genuine modal shift from the use of the private car
2. Maintain as a minimum the total amount of Green Belt, but redistributing it to protect valued land outside of the current rings around Bristol and Bath that had not been envisaged as being under threat of urban sprawl when it was created in the mid 1950s

In the event that this review of the Green Belt still leaves WEJA short of the housing need, then any proposed Strategic Location should be subject to a review of the impact of extra commuter traffic that is likely to follow, and the levels of additional pollution that would be imposed on

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residents in those areas. It is vital that this work is carried out before the JSP is adopted, because otherwise these sites become a fait accompli once included in the adopted JSP.