West of England
Joint Spatial Plan and Transport Study
Towards the Emerging Spatial Strategy and Transport Vision
Consultation report 2017
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EXECUTIVE SUMMARY

This report includes the second phase of consultation results to help inform the draft Joint Spatial Plan (JSP), which is intended to be adopted in 2018. The JSP will set out a prospectus for sustainable growth and will be a statutory Development Plan Document that will provide the strategic overarching development framework for the West of England for the next 20 years to 2036.

In the autumn of 2016, residents, businesses, the development sector and other stakeholders have responded to the draft proposals in delivering new homes, land for employment and infrastructure; and this report includes the responses received from the second consultation.

The Unitary Authorities will now take the next few months to consider and evaluate the consultation responses and as appropriate, to revise draft proposals that will allow the West of England to meet the predicted demand for new housing and jobs over the next 20 years, as well as the schemes that will tackle existing issues on roads and other infrastructure to help meet the increased demands that will come with growth in population and economic activity.

In the Summer 2017 we are aiming to publish an updated draft proposal for a further round of consultation in Autumn 2017. The feedback from this consultation will in turn be considered and incorporated into a final draft Joint Spatial Plan that will be submitted to the Secretary of State. An independent Planning Inspector will then consider the plan at an Examination in Public (EiP). Following the EiP the plan will then be adopted by the four Authorities.

Once adopted, the JSP will guide the four Local Authorities (Bath and North East Somerset (BANES), Bristol City, North Somerset and South Gloucestershire Councils) in the development of their own Local Plans.

The four Authorities will retain control over how development is permitted in their area, but the demand and approach to meeting that demand will have been decided collectively and with extensive public and stakeholder consultation.

This report also summarises the second phase of consultation results on the Joint Transport Study (JTS) Transport Vision, undertaken in parallel with the consultation on the JSP. The consultation results will be taken into account in the production of a JTS Final Report, which will then inform the formulation of an update to the West of England Joint Local Transport Plan, to be the subject of a further consultation later in 2017.
The new Metropolitan Combined Authority (MCA), led by the West of England Mayor (due to be elected on May 4), will have responsibility for managing the delivery of aspects of housing and infrastructure growth according to the elements of the JSP and JTS that cover Bristol, BANES and South Gloucestershire. North Somerset will continue to work in close partnership with the other Authorities, while not being formally part of the MCA.

Introduction

The second stage of consultation encompassed both the Joint Spatial Plan (JSP) Towards the Emerging Spatial Strategy Document and the Joint Transport Study (JTS) Transport Vision Document. The JSP document set out suggested measures and strategic locations for development between 2026-2036 and takes into account a range of issues including overall housing need, affordable housing, green belt, environmental issues (including flood risk) as well as integration with transport corridors, hubs and investment as set out in the JTS Transport Vision.

The Transport Vision set out an ambitious programme of investment in the West of England transport network, to address both current challenges on the network and to address the impact of future growth.

The consultation ran from 7 November to 19 December, over a period of six weeks and was the second stage of consultation in the draft plan making stage (regulation 18) for the JSP. The level of engagement undertaken reflects the Unitary Authorities aim to have an ongoing dialogue on the work to date and it also meets statutory planning requirements. In addition, the JTS consultation was also a second stage of engagement, following a consultation on objectives and concepts undertaken between November 2015 and January 2016.

Overview on Issues and Options (2015) consultation

During the first issues and options consultation, nearly 900 respondents participated and provided feedback. Overall, there was broad agreement with 90% agreeing with the spatial objectives set out.

From the 10 objectives set out in the issues and options consultation, the most important objectives identified by respondents related to:

- Ensure that the right infrastructure is provided and that new development does not worsen existing pressures.
Maximise the use of brownfield land.

Focus on housing and employment which links to public transport and active travel methods and reducing unsustainable travel patterns.

Maintain or enhance the environmental quality and responding to the challenges of climate change.

Most respondents considered the best spatial scenario for the West of England area to encompass Transport focussed development and protection of the Green Belt. This feedback has helped to inform the focus of the Emerging Spatial Strategy document.

Towards the Emerging Spatial Strategy consultation 2016

The purpose of the second stage of consultation was to:

• Inform local residents and other key stakeholders about the current stages of the JSP and JTS and how they can participate.

• Explain how the evidence base has been gathered and how this has led to the current Emerging Spatial Strategy and Transport Vision.

• Provide an update on how the responses to the previous stage of consultation have informed and contributed towards the Emerging Spatial Strategy and Transport Vision.

• Explore the suitability of the potential strategic housing and employment locations with local communities and stakeholders.

• Engage, seek views and gather opinion on the JSP Emerging Spatial Strategy.

• Present and seek views on the overall JTS Transport Vision, including a suggested scale of ambition to address current and future challenges up to 2036, and suggested packages of multi-modal investment to address these challenges.

• Explore the suitability of the package of infrastructure measures identified in the Transport Vision, including associated transport mitigation to support the emerging JSP strategy up to 2036.

• Provide decision makers with information to assist them in making informed decisions about plan development and delivery.
- Raise awareness about the consultation and direct stakeholders to source consultation documents and materials to facilitate a conversation on the evidence and technical work and how the locations have been tested to inform the Preferred Spatial Strategy.

- To encourage active participation in the consultation process.

Towards the Emerging Spatial Strategy and Transport Vision engagement programme

The communications and engagement programme included a range of methods including both online offline channels.

Offline channels utilised during the consultation included:

- A launch event that included a presentation and question and answer session,

- A media briefing that was held prior to the launch event to ensure the media were informed the JSP and JTS consultation as well as the opportunity for reporters and the press to ask direct questions related to the Emerging Spatial Strategy and Transport Vision.

- Four themed workshops were held across the West of England region and included the invitation of targeted stakeholder audiences to discuss the key issues in the JSP and JTS as well as to seek professional input.

- Six business consultation events were coordinated with the support from Business West

- 15 local consultation drop in session were coordinated across the region.

Online channels included:

- Using a single website for all consultation documentation, and redirects from Unitary Authorities websites to promote the single website

- Supporting documents, collateral and materials to facilitate greater engagement beyond the other activities highlighted

- An audience friendly illustrative video explaining the JSP and JTS

- Social media channels including Facebook and Twitter to promote the consultation and regional exhibition events.
A communications plan and key messaging was developed to ensure the consultation was appropriately targeted, engaged the relevant stakeholders and that it had the broadest possible reach and appeal. The key messages document enabled all Unitary Authorities to utilise and disseminate consistent information across the area and subject matter.

A detailed explanation of the communication channels utilised is given below:

WEST OF ENGLAND JOINT SPATIAL PLAN AND JOINT TRANSPORT STUDY LAUNCH EVENT

The JSP and JTS launch event was held on Tuesday 8 November at The Watershed in Bristol. Over 300 invitations were directly emailed along with multiple reminder emails to senior planning and transport stakeholders to ensure awareness as well invitations to members on the Planning, Housing & Communities Board, Joint Transport Executive Committee and Joint Scrutiny Committee. Furthermore, Chief Executives and council Leaders were invited to attend. Invitations were targeted to senior level stakeholders who would be in a position to communicate their perspectives and findings from the launch event to a wider audience within their own organisations and respective channels. In total 120 people registered to attend the JSP and JTS launch event (40% of invited guests) through Eventbrite and 150 people attended the launch event.

The overall feedback received regarding this event was positive about the venue, video and presentation on JSP and JTS.

WEST OF ENGLAND JOINT SPATIAL PLAN AND JOINT TRANSPORT STUDY MEDIA BRIEFING

The JSP and JTS media briefing was also held on Tuesday 8 November prior to the launch event, at the Watershed in Bristol. The briefing was attended by reporters from prominent local online and offline media including:

- BBC Bristol
- Heart FM
- Bristol 24/7

West of England spokespeople provided the media with a presentation and overview of the issues and then provided interviews and statements. The briefing assisted towards positive and balanced media coverage.

In addition, North Somerset Council held a regional media briefing following the publication of their council papers in November and South Gloucestershire Council offered the opportunity of a media briefing however, this was not taken up by local publications.
TOWN AND PARISH COUNCIL, MP AND JOINT FORUM BRIEFINGS

Bristol City Council presented the JSP and JTS consultation at the Bristol Neighbourhood Planning Network meeting (15 November) and Bristol Neighbourhood Partnerships meeting (22 November)

Prior to the consultation, Bath and North East Somerset (BANES) council held joint forum briefings on the JSP and JTS with the Bathavon Forum, Bath City Forum, Chew Valley Area Forum, Keynsham Area Forum and Somer Valley Forum. Additional meetings coordinated by BANES included a parish liaison meeting as well as BANES Chamber of Commerce and BANES Initiative.

North Somerset council coordinated pre-briefings with parish and town councils (1 November), MP’s were personally briefed and meetings were coordinated amongst developers and agents.

South Gloucestershire council held a briefing for their town and parish councils (1 November) and then held two following meetings with the town and parish council that would be directly be affected by the growth identified in the Emerging Spatial Strategy.

WEST OF ENGLAND JOINT SPATIAL PLAN AND JOINT TRANSPORT WORKSHOPS

Four themed workshops were held across the West of England with targeted audiences to discuss some of the key issues in the JSP and JTS and to obtain their professional input on the emerging spatial strategy and transport vision.

Monday 21 November - Environment, Design and Health workshop
The workshop was hosted by Bath and North Somerset Council and independently facilitated by Mark Pearson of Design Action, the workshop explored prospects for place-making qualities within the current Emerging Spatial Strategy and obtain comments and recommendations in order to positively influence its next stage of development. Attendees included experienced practitioners, officers, academics and representatives from other public and private bodies and interests.

Workshop attendees formed into groups and focussed on one of the three distinct development typologies predicted within the plan - urban living, growth within transport corridors and new settlements, urban extensions/town expansion to enable deeper consideration of the particular challenges each typology faces. The findings of the individual groups included that a high level principle of good practise may well apply equally across all the three types, but there will almost certainly be different challenges when it comes to implementation and delivery within each typology.

The workshop final discussion focussed upon the suitability of the Joint Spatial Plan in relation to the place-shaping and quality of life topics under consideration. For more information see workshop report by Design Action – Appendix 1.
THURSDAY 1 DECEMBER – Boosting Affordable Housing Delivery workshop

This workshop was hosted by South Gloucestershire Council and facilitated by Nick Horne, Chief Executive of Knightstone and Member of the LEP Board chaired the event. This workshop was attended by key members of the development industry, housing professionals and community representatives, to explore the options for boosting the supply of affordable housing and to ensure the Unitary Authorities are utilising all of the possible opportunities to meet the shortfall identified in the Emerging Spatial Plan.

The host clarified the policy content and scale of the affordable housing challenge. Attendees were divided into smaller groups to explore the options for boosting delivery by attempting to identify what would and wouldn’t work and to agree on new ideas to take forward. An interactive session followed in rating each option (using a traffic light system of green and red stickers) to aid discussion.

Below are some of the discussion points raised at the workshop. For more information see workshop report – Appendix 2.

- The challenge of boosting affordable housing delivery is considerable and there are no easy solutions.
- It is critical to bring in some kind of subsidy, either public subsidy or developer subsidy.
- Viability is key, especially given the sites profile in Bristol and the focus on brownfield sites.
- Developers need certainty and therefore options that seek to operate on a variable level of provision are less attractive.
- Imposing higher % requirement for affordable housing may mean that sites just don’t come forward as they are not viable.
- A suite of options is required, with carrots as well as sticks.
- There is potential to think creatively, for example an ‘over-programming’ approach to incentivise delivery without increasing the overall housing numbers.
- Undoubtedly starter homes will have a big impact – not quantifiable at present.
Increasing housing numbers should not be automatically ruled out.

Many proposed solutions would accelerate supply but not necessarily boost it.

Manchester is an example of good practice that the WoE could emulate.

**MONDAY 5 DECEMBER – Economy and employment workshop**

The workshop was hosted by Bristol City Council and Business West. Attendees discussed and reviewed the balance of employment opportunities and development, forms of business provisions required, BREXIT, monitoring demand and response, incentives, market intervention and looking at longer term investors. Some of the discussion points raised at the workshop include:

- The current emerging Spatial Strategy suggests more housing development in the north and there are no significant employment opportunities identified in the south. Employment opportunities in South Bristol will need to be coupled with a step change in skills and educational attainment and how can this be articulated in a land use plan?

- The distribution of development doesn’t appear to maximise opportunities for sustainable travel through close proximity to Bristol.

- The potential investment for the Airport will also provide employment opportunities in the south of the region area.

- Some expressed views around competition with other areas and it was highlighted that businesses which had outgrown their existing location are likely to move to comparable areas in other cities instead of/as well as, being retained in the area and moving to another Enterprise Area (EA)/Enterprise Zone (EZ) within the region.

- High quality office provision in Bristol and Bath city centre.

- Housing and employment provisions are not often well served by either living/work provision or proximity of residential housing to employment, frequently to mutual disadvantage.

- Not all EA’s are easy to deliver. For example Avonmouth/Severnside is proving difficult to obtain occupiers for. An Enterprise Area at Bristol Airport could be successful in delivering and focusing on aircraft maintenance, high tech R&D jobs, research on aviation and conferencing. However, providing accessibility through the A38 will be a key factor.

- Agreement amongst attendees to influence the quality and type of future industrial/commercial property.
The workshop was hosted by North Somerset Council and was attended by key members from transport industry as well as key members associated to infrastructure provision and development in the West of England. The workshop divided attendees into smaller groups each with a facilitator, who led a transport and infrastructure discussion for 30 minutes each.

The outcomes from this workshop included:

**Transport**

- Differing views on the level of ambition suggested in the JTS
- Phasing is critical
- Concerns on deliverability (capacity, skills and politics)
- Are some locations too small to sustain transport services?

**Infrastructure:**

- Again phasing is critical
- Fewer/larger/higher density developments with an urban focus and good connections to existing settlements/facilities.
- Differing views on Green Belt and new towns
- Recognition to plan for jobs and the economy not just housing.

Below are some of the discussion points raised at the workshop. For more information see workshop report – Appendix 3.
Transport

- Is the level of ambition right?
- Is there support for constraining traffic movement to relocate road space to other modes?
- Is the mix of the proposed package about right?
- Is there anything missing from the JTS Vision?
- Additional transport issues

Infrastructure

- Does the scale, location or type of development affect the effectiveness of infrastructure delivery? And is the strategy of making the best use of brownfield land and improving the use of transport corridors an effective strategy for delivering infrastructure?
- Is there any reason why the strategy or identified locations could not be delivered in relation to infrastructure provision?
- Are there other reasonable alternative locations which would better meet the strategic priorities (economic, social environment and particularly infrastructure)? Additional infrastructure issues.
Face to face stakeholder meetings and exhibitions across the region were coordinated to raise awareness of the JSP and JTS consultation and gather views and opinions from individuals, as well as to answer particular individual questions. In total 20 events and exhibitions were arranged across the West of the England.

<table>
<thead>
<tr>
<th>LOCATION</th>
<th>DATE</th>
<th>TIME</th>
<th>VENUE</th>
<th>LEAD UA</th>
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<tbody>
<tr>
<td>Keynsham Exhibition</td>
<td>Monday 7 – Friday 18 November</td>
<td></td>
<td>Keynsham library</td>
<td>B&amp;NES</td>
</tr>
<tr>
<td>Somer Valley Exhibition</td>
<td>Monday 21 - Friday 2 December</td>
<td></td>
<td>The Hollies reception, Midsomer Norton</td>
<td>B&amp;NES</td>
</tr>
<tr>
<td>Bath Exhibition</td>
<td>Monday 5 - Friday 16 December</td>
<td></td>
<td>Bath One Stop Shop, Lewis House</td>
<td>B&amp;NES</td>
</tr>
<tr>
<td>Somer Valley</td>
<td>21-Nov</td>
<td>5pm</td>
<td>MSN Town Hall</td>
<td>B&amp;NES</td>
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<tr>
<td>Keynsham and Whitchurch</td>
<td>22-Nov</td>
<td>6pm</td>
<td>Community Space, Civic Centre</td>
<td>B&amp;NES</td>
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<tr>
<td>Bathavon</td>
<td>28-Nov</td>
<td>6pm</td>
<td>St Gregory’s School</td>
<td>B&amp;NES</td>
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<tr>
<td>Chew Valley Area Forum</td>
<td>29-Nov</td>
<td>6pm</td>
<td>Chew Valley Secondary School</td>
<td>B&amp;NES</td>
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<tr>
<td>Bath City</td>
<td>01-Dec</td>
<td>6pm</td>
<td>Guildhall,</td>
<td>B&amp;NES</td>
</tr>
<tr>
<td>Bristol</td>
<td>17-Nov</td>
<td>12-3pm</td>
<td>Bristol Central Library</td>
<td>Bristol</td>
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<tr>
<td>South and East of Whitchurch Village</td>
<td>23-Nov</td>
<td>1.30-4.30pm</td>
<td>Whitchurch Library (BCC), Oatlands Avenue</td>
<td>Bristol</td>
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<tr>
<td>Bristol</td>
<td>07-Dec</td>
<td>12-3pm</td>
<td>Deanery Vestibule, Bristol City Hall, College Green, Bristol, BS1 5TR</td>
<td>Bristol</td>
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<tr>
<td>Banwell</td>
<td>02-Dec</td>
<td>6.45-8.45pm</td>
<td>Banwell Village Hall, Westfield Road, Banwell, BS29 6BA</td>
<td>NS</td>
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<tr>
<td>Churchill and Langford</td>
<td>23-Nov</td>
<td>5.30 - 7.30pm</td>
<td>Churchill Primary School, Pudding Pie Lane, Langford, BS40 5EL</td>
<td>NS</td>
</tr>
<tr>
<td>Backwell</td>
<td>22-Nov</td>
<td>5-7pm</td>
<td>Backwell Parish Hall, Station Road, Backwell</td>
<td>NS</td>
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Key issues raised at events held in BANES include:

- **Somer Valley**: Support for not allocating strategic growth in the Somer Valley

- **Keynsham**: Why is Keynsham a major focus for growth? In planning for further housing growth at Keynsham there is a need to ensure necessary infrastructure and services/facilities are provided and that impact on town is properly considered

  Importance of maximising use of brownfield sites/vacant building in the urban areas e.g. greater use of vacant offices in Bristol for housing

  Quality of place for existing and future communities is important and environment/GI plays a crucial role in this.

- **Bathavon**: Green Belt - are we able to consider adding land to the outer edge of the Green Belt to compensate for land removed on the edge of urban areas?

  Park and ride - whether there is justification to expand the existing sites further in the context of the size of the city and their performance

- **Chew Valley**: Vital that transport infrastructure is provided before housing and queries on how the roads through the Chew Valley might be impacted

- **Bath City**: Limitations on provision of Affordable Housing.
  More structure required to support emerging communities, including large increases in students in the City.
Key issues raised at events held in Bristol included:

**Bristol:** Support for no Strategic Development Location at Long Ashton;

- Concern expressed about the delivery of transport proposals and delays in delivery;
- Concern expressed about the lack of measures to address homelessness.
- General support for overall transport proposals
- Some people felt more should be spent on active travel
- Objection to increased urban intensification in Lawrence Hill due to the impact upon services and quality of life – suggested locating development on outskirts of the city where development is less dense and there are high volumes of green space.
- Concern expressed about the port being used for industrial processes which have a detrimental impact on nearby residents.
- Support for more segregated cycle routes, particularly to the east, although stressed that LRT to East Bristol should not be built on the Bristol & Bath Railway Path
- Support for not building on the Green Belt in general, whilst managing growth to avoid unplanned sprawl.

**Whitchurch:** Support for the need for new homes.

- Some support for transport infrastructure proposals, including proposed new/improved road and Metrobus around South East Bristol.
- Some objection to the proposed new/improved road and MetroBus around South East Bristol from local residents.
- A number of people were concerned about the existing services in the area already being at capacity and the impact of new development on services and infrastructure.

Key issues raised at events held in North Somerset included:

**Backwell:**

- Increased congestion
- Pressure on A370/Station Rd traffic light junction and lack of capacity to accommodate more traffic
WEST OF ENGLAND
“BUILDING OUR FUTURE”

- Improvements to rail capacity and frequency
- Routing of the proposed new highways particularly the “Backwell Bypass” and concern that there will not be space to accommodate this between Nailsea and Backwell given the area already accommodates Backwell Lake, and the station car park and is prone to flooding.
- Feasibility of a new access at Junction 20 and nature conservation and flooding issues.
- Pressure on other village infrastructure.
- Opportunities for self-build

Churchill:
- How this relates to existing planning application pressure at Churchill
- Existing traffic congestion issues.
- Unsustainable location, difficult to get to Bristol, particularly by public transport – proposal would be car dependent.
- Impact on AONB.
- Attractive rural countryside – landscape and ecological impacts.
- Drainage problems.

Nailsea:
- The feasibility of a road (“Backwell Bypass”) between railway line and Backwell Lake
- Impact on existing services
- Loss of views and open countryside, adverse impact on setting of the town
- Flooding
- Impact on rhynes and SSSI’s, as well as Backwell Lake and nature reserve
- Lack of local employment.
Banwell:

- Support for Banwell Bypass (but not necessarily associated development) to remove through traffic from the village
- Retaining village character
- Concern about impact on Hutton from new M5 Junction (Jn21a)
- Impact of development on existing character of Banwell—separation/separate settlement would be better
- Impact on Sandford and other communities of building Banwell Bypass.

South Gloucestershire:

Feedback from the South Gloucestershire location events in Charfield, Coalpit Heath, Falfield, Thornbury, Yate & Chipping Sodbury

- Over 100 people attended each event, most were open minded and pragmatic about the future challenges in the area and welcomed the joint working approach between the four local authorities, although challenging.
- There were concerns about the level of growth and development of the scale proposed by the JSP and the locations being consulted on.
- Concerns about the loss of Green Belt land, greenfields and landscape value, including agricultural land that this could lead to.
- People generally welcomed the fact that there was a suggested JTS Vision.
- Issues raised to both strategic motorway and A-roads as well as local traffic congestion that would connect local roads to new development areas, including both pedestrian and cycle routes. It was identified that there was a lack of good reliable public transport and demands being placed on local community facilities and services, such as doctor’s surgery’s and schools.
- People emphasized the need for investment in public transport and transport infrastructure to take place either before or at the same time as the new development.
- People attending were keen to know specific details of development, including the type of homes that will be built, how affordable they will be, the relationship with the existing community and what supporting infrastructure will be provided?
BUSINESS EVENTS

In association with Business West six business events were coordinated, these included:

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<tr>
<th>DATE</th>
<th>TIME</th>
<th>Meeting</th>
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<tbody>
<tr>
<td>03-Nov</td>
<td>2pm - 4pm</td>
<td>LEP Construction &amp; Development sector group</td>
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<tr>
<td>10-Nov</td>
<td>8.30am - 10am</td>
<td>Business Wests Planning and Transport Group</td>
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<tr>
<td>10-Nov</td>
<td>12pm</td>
<td>Bristol Planning and Law Conference</td>
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<tr>
<td>15-Nov</td>
<td>4.30pm - 6.30pm</td>
<td>Business West Area Bristol /North Fringe</td>
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<tr>
<td>23-Nov</td>
<td>Midday (1pm - 2.30pm)</td>
<td>Business West Area meeting BANES</td>
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<tr>
<td>29-Nov</td>
<td>5pm - 6.30 pm</td>
<td>Weston Business Meeting (Business West Area Meeting N Somerset)</td>
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MEETINGS

During the consultation period, Unitary Authorities also took the opportunity to present and mention the JSP and JTS proposals and consultation at internal and external meetings. A full list of the meetings can be found in Appendix 4.

Joint Planning website

Careful consideration was given to the website to ensure that it was accessible, engaging and provided accurate information to all stakeholders and the general public to enable maximum impact.

The consultation documents, supporting technical information and consultation events calendar, is available for viewing on a web based information hub www.jointplanningwofe.org.uk with links to/from each council.

From 1 November 2016 to 10 January 2017, the joint planning website received 150,834 views.

69% viewed the site via a desktop device and 31% viewed the site on a mobile device.
In particular the JSP landing page received 7920 views between 1 November 2016 - 10 January 2017 www.jointplanningwofe.org.uk/consult.ti/JSPEmergingSpatialStrategy/consultationHome

In particular the JTS landing page received 4234 views between 1 November 2016 - 10 January 2017 www.jointplanningwofe.org.uk/consult.ti/JTSTransportVision/consultationHome

The majority of visits have come from a Bristol then London and then Bath postcode.

Documents and collateral

To support the consultation, technical document and evidence base papers were available online and included:

JSP technical document and evidence base papers:

- **West of England Joint Spatial Plan – Towards the Emerging Spatial Strategy Document**
- Towards the Emerging Spatial Strategy: Housing Capacity Evidence Paper
- Towards the Emerging Spatial Strategy: Urban Living Topic Paper: Maximising the development potential in the urban areas
- Towards the Emerging Spatial Strategy: Green Belt Assessment Stage 2
- Towards the Emerging Spatial Strategy: West of England Housing Target: The basis for the Housing Requirement in the Joint Spatial Plan
- Bath Strategic Housing Market Assessment: Establishing Objectively Assessed Need
- Towards the Emerging Spatial Strategy: Ecosystem Services Evidence to inform the West of England Joint Spatial Plan Part 2: Location Assessments
- Towards the Emerging Spatial Strategy: Sustainability Appraisal:
• Towards the Emerging Spatial Strategy: Sustainability Appraisal: Explanatory Note and assessment of Non Green Belt and Emerging Technical Scenario

• Towards the Emerging Spatial Strategy: Sustainability Appraisal: Summary of Findings

• Towards the Emerging Spatial Strategy: Sustainability Appraisal: Methodology Paper

• Towards the Emerging Spatial Strategy: Sustainability Appraisal: Locational assessments


• Towards the Emerging Spatial Strategy: Assessment of Strategic Development Locations Beyond Settlement Boundaries:
  
  • Towards the Emerging Spatial Strategy: Assessment of Strategic Development Locations Beyond Settlement Boundaries: Location Dashboards

  • Towards the Emerging Spatial Strategy: Assessment of Strategic Development Locations Beyond Settlement Boundaries: Assessment of strategic development locations beyond settlement boundaries methodology paper

  • Schedule and mapping of Sites submitted in response to the Issues and Options consultation

  • Link to the online mapping system showing locations submitted as part of the JSP

  • Location submission form

JTS technical document and evidence base papers:

• West of England Joint Transport Study – Transport Vision Summary Document

• West of England Joint Transport Study – Emerging Transport Vision Topic Paper

Various documents and supporting information were created and made public online and at a range of public deposit stations including council offices and local libraries and included:

• Summary flyer
• Frequently Asked Questions document
• Exhibition boards
• Office banners
• Posters to promote regional location drop in events
Illustrative video

Diode Digital Research highlight that video promotion is 600% more effective than print and direct mail combined and that, before reading any text, 60% of site visitors will watch a video if available. As a result of the broad scope of the JSP and JTS it was felt that a critical component of the communications strategy should be a short video to summarise and instantly engage both web visitors and offline stakeholders when the video was displayed (e.g. launch event and location events).

A short 2.33 min was created to provide an overview of the JSP and JTS. In total during Oct 16, Nov 16, Dec 16 and Jan 17 the video played 1,185 times and from the total video plays, the video was watched from beginning to end 771 times (65% of all views).

Social media

SocialMediaToday explains using social media makes it easy to improve brand awareness and build your brands identity. As a result of the broad scope of the JSP and JTS, a critical component of the communications strategy included using social media to:

- Promote and increase awareness of the consultation
- Explain how to get involved and participate
- Promote the consultation timeframe
- Enable stakeholders to cascade key messages to help spread the word
- Facilitate engagement and obtaining views, opinions and particular questions
- Redirect to the consultation website and video

Facebook and twitter social media channels were used, a dedicated #Webuildourfuture on twitter made it easier for people to find and follow the discussion on the consultation. Discussions, comments and posts on Facebook varied from action groups, parish councils, further education, transport, environmental and housing organisations
Below are examples of tweets during the consultation:

**AWARENESS AND PROMOTION**

![Image 1]

**GETTING INVOLVED**

![Image 2]

**VIEWS AND OPINIONS**

![Image 3]

**CONSULTATION TIMESCALES**

![Image 4]
Press releases and coverage

Central releases were integrated into the communications plan and issued on behalf of the Unitary Authorities. The objective of the releases was to raise awareness of the Transport Vision and Emerging Spatial Strategy, encourage responses and allow people to participate in the debate.

Central releases issued:

- 7 November: Consultation launched on the West of England Joint Spatial Plan and Joint Transport Study.
- 12 December: Residents encouraged to consider ambitious transport proposals as part of consultation for the next 20 years of growth
Media coverage summary over the consultation period:

- There was extensive coverage across the four participating LAs, in the lead up to and run out from the consultation process.

- The JSP/JTS is now part of the equation and routinely referenced by regional media when covering stories about strategic housing supply and infrastructure projects.

- Coverage was received on BBC across TV and radio channels.

- The tone of much of the coverage was negative towards specific proposals, even though they weren't described in detail in the consultation draft proposals. This was amplified where there are community campaign groups in place or able to mobilise swiftly. However, these stories did include our call to action, which was that the consultation was open and people were encouraged to participate.

- Typically coverage was amplified where LAs ran local outreach and briefing sessions, particularly in areas where Strategic Development Locations had been proposed as it was perceived that these areas would be more likely to be impacted by either housing or infrastructure investment proposed in the consultation draft.
Demographics from the JSP and JTS consultation

This chapter highlights the Joint Spatial Plan (JSP) and Joint Transport Study (JTS) demographic statistics from the consultation.

**JSP - AGE OF RESPONDENTS**

37% of the total responses (587) provided their age and the results included:

![JSP Age Distribution Chart]

**JTS - AGE OF RESPONDENTS**

54% of the total responses (476) provide their age and the results included:

![JTS Age Distribution Chart]
JSP – GENDER OF RESPONDENTS

39% of the total responses (617) provided their gender and the results include:

- 57% Female
- 40% Male
- 3% Prefer not to say

JTS – GENDER OF RESPONDENTS

56% of the total responses (493) provided their gender and the results include:

- 62% Female
- 35% Male
- 3% Prefer not to say

JSP – POSTCODE OF RESPONDENTS

78% of the total responses (1,250) provided their postcode and the results include:

- 27% B&NES
- 8% Bristol
- 22% North Somerset
- 39% South Glos
- 4% Outside West of England
66% of the total responses (574) provided their postcode and the results include:

<table>
<thead>
<tr>
<th>Local Authority</th>
<th>% of all responses</th>
</tr>
</thead>
<tbody>
<tr>
<td>B&amp;NES</td>
<td>26%</td>
</tr>
<tr>
<td>Bristol</td>
<td>10%</td>
</tr>
<tr>
<td>North Somerset</td>
<td>12%</td>
</tr>
<tr>
<td>Outside West of England</td>
<td>4%</td>
</tr>
<tr>
<td>South Glos</td>
<td>14%</td>
</tr>
<tr>
<td><strong>Total responses with a valid postcode</strong></td>
<td><strong>66%</strong></td>
</tr>
</tbody>
</table>
JSP - STAKEHOLDER TYPE

80% of the total responses (1278) provide details to which stakeholder group respondents were representing and the results included:

- Business community / other relevant body: 80%
- Development Sector: 4%
- Prescribed Bodies under the DIC: 4%
- Town & Parish Council: 5%
- General public: 7%

JSP – ETHNICITY OF RESPONDENTS

36% of the total responses (573) provided their ethnicity and the results included:

- Black and minority ethnic background: 0%
- Other white background: 2%
- Prefer not to say: 7%
- White British background: 91%

JTS – ETHNICITY OF RESPONDENTS

53% of the total responses (459) provided their ethnicity and the results included:

- Black and minority ethnic background: 0%
- Prefer not to say: 5%
- Other white background: 5%
- White British background: 90%
JSP – DISABILITY OF RESPONDENTS

33% of the total responses (529) answered the disability question and the results included:

- No: 30%
- Prefer not to say: 2%
- Yes: 1%

JTS – DISABILITY OF RESPONDENTS

50% of the total responses (433) answered the disability question and the results included:

- No: 90%
- Prefer not to say: 5%
- Yes: 5%
JSP key issues statement

This chapter summarises the consultation responses that were made to the Joint Spatial Plan (JSP). It includes the comments and feedback from the six questions, as well as the feedback to the call for sites exercise that was published alongside the JSP in November 2016.

In total over 1,500 people representing a wide range of stakeholder groups responded to the below JSP consultation questions:

| QUESTION 1 | Does the proposed strategy make adequate provision to address the housing needs of the West of England? |
| QUESTION 2 | How can we increase the delivery of homes, in particular much needed affordable homes in the West of England? |
| QUESTION 3 | Does the proposed strategy make adequate provision to address the economic and employment needs of the West of England? |
| QUESTION 4 | Does the preferred strategy and the locations identified meet the plans strategic priories? |
| QUESTION 5 | Are there any reasons why this strategy or identified locations could not be delivered? |
| QUESTION 6 | Is the preferred spatial strategy the most appropriate strategy when considered against the reasonable alternatives? |

The key issues which people who responded to the consultation identified are included within this report, along with an initial officer response. The assessment of these key issues will be used to help inform the next stages of the plan-making process.

A list of participants is attached at the end of this report.
Key Themes Arising from the JSP Consultation

**Vision:** There was support for the Vision, the Strategic Priorities and their spatial implications from a number of development sector bodies and government agencies, but with some caveats.

Some respondents considered certain proposed Strategic Development Locations to be unsustainable and contrary to the strategic priorities and vision set out in the Emerging Spatial Strategy. Some respondents stated that the Vision did not highlight the need to address service and infrastructure requirements or recognise the importance of smaller sites in delivering the whole Vision for the JSP.

**Overall level housing provision:** The majority of respondents felt the number of homes planned for was adequate, this view was mostly expressed by residents (80% of those that responded), local companies/organisations, local interest groups, development sector respondents and parish/town Councils. The majority of local residents considered the housing needs to have been over estimated but several respondents considered not enough housing was proposed. These respondents were largely from the development sector and business community and their comments included that an uplift in housing numbers is required to meet housing needs and in order to have an impact on overall levels of affordability.

**Delivery of affordable housing:** There was acknowledgement of the agreed need for Affordable Housing (AH) as a critical issue and the need to build more AH for young people. Several developers also considered the affordable housing target should be higher, other comments and suggestions on delivery of affordable housing included:

- Enforce a minimum target on a region wide basis to ensure the Affordable Housing need of 32,200 dwellings is delivered.
- Only grant permission where the target AH % is agreed
- Affordable housing requirements must be enforced and developers should not be Allowed to renegotiate provision once permission has been granted;
- The councils should be proactive in challenging viability assessments to ensure that planned levels of affordable housing are achieved.
- The Plan should identify potential ways in which the demand for affordable homes can be met;
- There should be development of homes by public bodies;
- Authority owned land should be used solely for affordable housing.
- The need for affordable rental housing;
- The need for such homes to be high quality and energy efficient.

**Improving the delivery of homes:** Most comments (170 responses) suggested reviewing the ways in which the planning process could be utilised and/or amended. Responses to enhance the process included:

- Speeding the planning process up through new policy in the JSP
- Adding a Planning Policy context for the delivery of ‘garden villages’ considered as capable of delivering housing at high delivery rates.
- The need for developers to set delivery rates.
- Promoting benefits for developers to develop their sites at an increased rate.
- Imposing penalties for failure to deliver
- Focus development in areas where infrastructure investment is already taking place
- Enforcement of planning agreements
- Supported a more diverse mix of development opportunities
- Making better use of existing empty dwellings.
- Addressing the 5-year supply issue,
- Innovative construction solutions (e.g. modular housing) which can be built quickly and efficiently.
- Potential new funding options from the devolution deal

**Employment:** Multiple responses (75 comments) agreed the Emerging Spatial Plan makes adequate provision to address economic and employment needs. Reasons for agreement included:

- Recognition of the alignment with the Strategic Economic Plan (SEP), and focus on the Enterprise Zones and Areas and South Bristol.
- Rebalancing of employment growth away from the communities in the North Fringe of Bristol was welcomed in helping to address inequality issues in South Bristol.
- Emphasis on urban living may result in the loss of existing employment sites.
The majority of responses (338) disagreed that the Emerging Spatial Plan makes adequate provisions to address economic and employment needs and suggested that the employment offer was limited locally. Additional comments and challenges to the employment strategy included:

- Lack of employment opportunities in areas proposed for housing
- Views that the strategy does not address the longstanding economic problems in South Bristol and Weston-super-Mare by focusing investment in both employment and housing in these areas.
- A perception that it does not accommodate the economic growth objectives of the Local Enterprise Partnership SEP.
- Views that key businesses in the area need to be formally recognised.
- The plan focused more on housing instead of employment opportunities.

**Strategic Development locations:** Many comments on the Strategic Development Locations were strongly steered towards transport issues. Responses on this included:

- Houses need to be located in locations where infrastructure is in place to support development
- The JSP should choose locations with good transport links to employment opportunities.
- Impact on the environment
- References to other infrastructure:
  - Potential pressures added to local schools, hospitals and GP surgeries, which are currently inadequate to support the population and creating an issues for delivery of Strategic Development Locations (SDLs).
  - The need to spread development over more SDLs increasing delivery as fewer ‘major’ infrastructure improvements would be required.

A further 100 Locations were put forward through the call for sites exercise that supported the JSP consultation. From the sites submitted, the majority of these were new and some were resubmitted by respondents from the previous issues and options consultation. These will be considered as part of the next round of technical work to support the preparation of the draft JSP.
In relation to the SDLs it should be noted that the responses were influenced by the interests of those responding. Within consultations of this nature, it is anticipated that the views are not wholly representative of the population and residents of these areas may react more negatively and promote alternative spatial options, in contrast to residents in areas that are not identified for development who are less likely to respond. Furthermore, the development industry may promote sites that they own or control and may not provide a balanced view of the location as part of a comprehensive joint spatial strategy.

**Green Belt:** Views on this subject were mixed, several comments (60 responses) specifically outlined that Green Belt land should not be used however, various comments (50 responses) outlined the need to use more Green Belt land. Respondents from the development sector considered that a Green Belt Review is required and should consider appropriate releases of Green Belt land in and around sustainable settlements, including consideration of the insetting of settlements. Several respondents also raised the issue of Green Belt exchange in relation to development on the edge of Bristol.

**Spatial Strategy:** Over half of the respondents thought the Emerging Spatial Strategy presented in this consultation was not the most appropriate strategy or that they had reservations about the strategy. Many of these were in respect of one or more of the strategic development locations as opposed to the overall strategy. Some (70) respondents were in agreement that the preferred spatial strategy was the most appropriate, albeit some with reservations. As noted above some views were clearly influenced by the interests of those responding and by a specific strategic development location as opposed to how the Emerging Spatial Strategy performs as a whole.

**Deliverability:** The majority of respondents considered there were reasons why the strategy could not (or should not) be delivered. The most common general reasons given for the strategy being considered undeliverable included:

- The resulting pressure on transport infrastructure (mentioned approx 1000 times), including that the necessary transport infrastructure is undeliverable
- Pressure on other infrastructure (mentioned over 700 times).
- An unsustainable strategy (raised nearly 350 times) i.e. would not meet the tests of environmental, and/or economic and/or social sustainability.

The rest of this chapter analyses the responses and feedback from each consultation question in the JSP.
Does the proposed strategy make adequate provision to address the housing needs of the West of England?

OVERVIEW

765 people responded to this question. Those who responded to question 1 were from the following groups:

- Individual members of the public- 580 (75% of those who responded)
- Interest groups (including resident action groups, environment groups and local political parties) - 30
- Development industry (including housing associations, landowners and developers)- 110
- Local government - 5
- Town/parish councils - 30
- Business community - 10
- Other bodies - 5

345 respondents gave a view on the overall housing needs of the West of England and whether the housing requirement proposed was adequate. The remaining respondents were commenting on the proposed strategic locations and comments to this are summarised under questions 4 and 5 below.

There were also 25 comments about the Vision for the Joint Spatial Plan. A number of respondents also made comments about the Green Belt specifically in the context of addressing housing needs. These comments are summarised under questions 2, 4, 5 and 6.

INSUFFICIENT HOUSING PROPOSED

In response to this question, 110 respondents considered that not enough housing was proposed for the West of England. Such respondents were largely from the development sector and business community. The responses argued that an uplift in housing numbers is required to meet housing needs and in order to have an impact on overall levels of affordability.
The development sector generally considered the housing numbers to have been underestimated and suggested increased numbers. The inclusion of the objectively assessed need (OAN) for the Bath housing market area was broadly welcomed.

ADEQUATE PROVISION MADE

145 respondents considered the strategy made adequate provision for housing across the West of England. This view was principally expressed by local residents (about 80% of those who responded) and also by some parish/town councils, local companies/organisations, local interest groups and development sector respondents.

Some of these respondents, although agreeing in terms of the overall provision, raised concerns in relation to specific locations and/or issues such as affordable housing and the provision of infrastructure. Some local residents accepted the need for more housing but disagreed with the amount identified in certain locations.

NEEDS OVER-ESTIMATED

90 respondents considered too many houses were being proposed. The majority were local residents who considered the housing needs to have been over estimated and raised issues including housing affordability, that there was insufficient affordable housing and that there was a need for smaller homes for first time buyers, as well as for an ageing population to downsize.

AFFORDABLE HOUSING

85 respondents considered that there was a need for more affordable housing. This view was principally expressed by local residents. However, several developers also considered the affordable housing target should be higher (see question two for more details).

HOUSING MIX, TYPE AND DELIVERY

Some respondents considered the approach to housing mix was not correct, the majority raising the issue of the need for more affordable housing. Other issues raised included specific housing for housing elderly people and the view that executive homes were not needed furthermore, there is no mention of self-build in the plan.

Several respondents from the development sector stated that not all sites will be capable of delivering the mix of units required to deliver a mixed and balanced community and that to overcome this, the JSP should seek to allocate a range of sites. It was also stated that the JSP and supporting evidence do not provide a breakdown of the mix of tenure of dwellings that should be provided in order to meet local needs.
OFFICER RESPONSE

The Emerging Spatial Strategy seeks to fully meet the Housing Target which is based on the ORS SHMAs for the Bristol and the Bath Housing Market Areas. This is documented in the Housing Target paper. The preparation of these SHMAs is in accordance with national planning policy and has been successfully tested at examination in other areas. This produces the Housing Requirement of 105,000 dwellings to be delivered between 2016 and 2036.

Alternative assessments of need that were submitted through the consultation will be considered in the formulation of the Regulation 19 Draft Pan.

Further Government releases on population and household data later this year might have implications for the OAN as might revised policy following the government Housing White Paper. However, the timing of these releases will determine whether these can inform the preparation of the draft plan.

DETAILS OF RESPONSES TO QUESTION 1

The Vision
25 respondents raised issues in relation to the vision. These were mainly local residents as well as the development sector, town/parish Councils, Stroud District Council, local political groups, business community/groups, action groups, residents associations and local environmental interest groups.

There was support for the vision, the strategic priorities and their spatial implications from a number of development sector bodies but with some caveats and criticisms. Several respondents considered certain proposed Strategic Development Locations to be unsustainable and contrary to the strategic priorities and vision set out in the plan. A few local respondents stated that the vision did not address service and infrastructure requirements. There was a view that the JSP must highlight and recognise the importance of smaller sites in delivering the whole vision for the JSP.

Business West stated there is a strong risk that continued failure to deliver housing will act as a significant drag on future performance and harm business performance and growth which will threaten the central element of the proposed vision.

Several local political groups/town/parish councils commented that the Vision fails to address the key economic challenge of the West of England (WoE) area, in terms of the overheating of the economy to the north of the area and the need for economic investment for the south Bristol to Weston corridor.
Stroud District Council recommended the vision is made more place specific.

Further comments received on the vision were in relation to climate change, carbon emissions, access to open space and the natural environment, and the promotion of high density developments (with potentially public or public/private provision of such homes so as to maintain the homes within the affordable homes sector).

**OFFICER RESPONSE**

Broad support for the Vision is noted.

With regard to views that the Vision needs to commit to meeting the needs of the area, the emerging spatial strategy does set out the commitment to meet the housing and economic needs of the sub-region. The scale of the challenge is acknowledged, but it remains a strategic priority of the plan.

The recommendation to make the Vision more place specific and to reference sustainability in terms of carbon reduction and the natural environment is noted.

**THE HOUSING REQUIREMENT**

A significant number of respondents from the development sector considered that the housing target in the JSP is insufficient to meet the actual level of housing need and suggested that a figure more consistent with the housing industry’s view should be adopted. Several provided detailed comments and analysis in respect of the housing evidence base - this includes comments from Business West, Barton Willmore, the National Housing Federation and the Home Builders Federation.

The Home Builders Federation (HBF) considered that the JSP will not make adequate provision to address the housing needs of the West of England nor increase the delivery of affordable housing. They considered the calculation of affordable housing needs has been underestimated and there is no proposal to increase overall housing requirement to help deliver affordable housing. They stated that it is not agreed that any such increase would create an imbalance between homes and jobs since the current proposed 105,000 dwellings is based on an economic growth forecast which is less than the LEP SEP commitment.

The HBF said that 14,300 dwellings from urban intensification has not been justified or evidenced by the authorities. They said the West of England (WoE) authorities should confirm that the appropriate balance between housing and employment land in different locations across the JSP area will not be disrupted by an over reliance of urban intensification for residential development.
The HBF considered that the overall figure as proposed by the JSP has no contingency. It recommended as large a contingency as possible - at least 20% - to the overall requirement to provide sufficient flexibility for unforeseen circumstances and in acknowledgement that the housing requirement is a minimum not a maximum figure.

Many respondents from the development sector referred to the West of England Housing and Economic Review (EDNA) Report and accompanying technical papers submitted separately by Barton Willmore. Barton Willmore considered that full objectively assessed housing need for the West of England is a minimum of 140,000 additional dwellings over the period 2016–2036.

Business West considered that the SHMA commissioned by the West of England is reliant on data that is out of date and projections that are unduly pessimistic. They stated these concerns are reinforced by the findings of the two separate papers on housing and affordable housing issues and employment land issues which were submitted along with their response. They considered provision should be made for 132,000 homes.

Other respondents from the development sector also set out in their responses concerns regarding how the OAN was assessed and calculated. Several respondents considered the JSP should express its housing requirement as a minimum target.

A number of development sector respondents stated that the SHMA does not provide a breakdown of housing need for the individual local authority areas.

Several respondents from the development sector stated that the dispersal of 3400 dwellings around the districts is welcomed and felt that there is scope for this to be increased to both meet existing or any increased housing need that might be identified as part of the examination process.

It was also stated that an increased requirement for housing will bring the need for consequential changes in the assessment of those towns and settlements set out in Table 2. Some respondents considered that there is a fundamental need to allocate additional land, in the most sustainable locations, which includes land within the Green Belt, in order to ensure the overall housing need is met and a rolling 5-year housing land supply maintained.

Respondents generally welcomed that a SHMA has been undertaken for the Bath Housing Market Area. However there was concern including from the University of Bath that it underestimated need. Mendip Council supported the intention of the strategy to meet the housing need of both Housing Market Areas within the West of England area itself with the majority of growth focussed at the main urban centres.

Respondents also referred to the Housing White Paper and stated that this may provide further directions in respect to the full objectively assessed housing need methodology which the Government will be expecting Local Plans to utilise.
OFFICER RESPONSE

Support for the inclusion of the Bath Housing Market Area and the commitment to meet need is noted.

The wide ranging views from stakeholders is strong evidence that there is no single or simple answer on identifying and seeking to accommodate the needs of the sub-region. The Emerging Spatial Strategy currently provides the framework to deliver up to 105,000 additional new homes in the West of England by 2036 which is based on the ORS SHMAs for the Bristol and the Bath Housing Market Areas. The preparation of these SHMAs is in accordance with national planning policy and has been successfully tested at examination in other areas.

Of the housing target of 105,000, around 32,200 (30%) need to be affordable homes, predominantly for social rent with some need for affordable rent and low-cost homeownership options. This is based on people spending no more than 35% of their gross household income on their housing costs (without housing benefit). Alternative assessments of need that were submitted through the consultation will be considered in the formulation of the Regulation 19 Draft Plan.

Further Govt releases on population and household data later this year might have implications for the OAN as might revised policy following the government Housing White Paper. However, the timing of these releases will determine whether these can inform the preparation of the draft plan.

AFFORDABLE HOUSING

The majority of respondents considered there was a need for more affordable housing especially in sustainable locations. Some respondents considered that if there was a higher housing target that it would be more likely that a higher number of affordable homes would be delivered.

The National Housing Federation and several others were concerned that the plan does not meet objectively assessed housing need and would fail to meet the tests set out in national planning policy. The Federation stated that they did not agree with the approach that has been taken to set the target at a significantly lower level than the number identified through the objectively assessed needs exercise. They considered the affordable housing targets should be amended to reflect objectively assessed need regardless of whether or not this is deemed to be achievable.
Business West submitted a detailed paper on housing and affordable housing issues (Housing Numbers for the West of England: Further Analysis and Commentary on the West of England Joint Spatial Plan). They commented that levels of affordable housing provision for those on lower incomes proposed by the SHMA are in themselves reasonable but the evidence suggests, in order for such levels to be delivered in practice a much higher level of overall housing numbers will be required.

The Home Builders Federation in their response considered that the calculation of affordable housing needs has been under estimated and that the actual affordable housing need is considered to be significantly above 32,500 dwellings, but that there is no proposal to increase overall housing requirement to help deliver affordable housing. They state that it is not agreed that any such increase would create an imbalance between homes and jobs since the currently proposed 105,000 dwellings is based on an economic growth forecast which is less than the LEP SEP commitment.

Mendip District Council was concerned that the approach to affordable housing is likely to have an impact upon housing demand in Mendip as the district generally offers lower cost housing than many areas in the West of England.

Other comments on affordable housing included:

- affordable housing requirements must be enforced and developers should not be allowed to renegotiate provision once permission has been granted;
- the plan should identify potential ways in which the demand for affordable homes can be met;
- there should be development of homes by public bodies;
- the need for affordable rental housing;
- the need for such homes to be high quality and energy efficient.
OFFICER RESPONSE

Of the housing target of 105,000, around 32,200 (30%) need to be affordable homes, predominantly for social rent with some need for affordable rent and low-cost homeownership options. This is based on people spending no more than 35% of their gross household income on their housing costs (without housing benefit). Alternative assessments of need that were submitted through the consultation will be considered in the formulation of the Regulation 19 Draft Plan.

The challenge of boosting affordable housing delivery is considerable and there are no easy solutions as it equates to over 1,600 affordable homes each year, requiring us to almost double what has been achieved since 2006.

The four Unitary Authorities have therefore invited the development industry, housing professionals, government departments/agencies and community representatives to help explore the options for boosting the supply of affordable housing to make sure that the authorities are doing absolutely everything possible to meet the shortfall.

While increasing the overall housing requirement number would have some effect on increasing affordable housing, this is not in itself the solution. Evidence prepared by West of England makes it clear that there is a tipping point whereby a higher overall housing requirement simply becomes an undeliverable housing quantum, which may mean housing sites just don’t come forward. Notwithstanding this, a suite of options is required. We intend to publish this work as part of the evidence base to inform the next stage of the JSP.

THE GREEN BELT

Respondents from the development sector considered that a Green Belt Review was needed which should consider appropriate releases of Green Belt land in and around sustainable settlements, including consideration of the insetting of settlements.

The Bath Chamber of Commerce and the Initiative in B&NES considered there was an over emphasis in the plan on the protection of Green Belt land and there are significant areas of poor quality land which could be developed without detriment to the environment.

Several respondents raised the issue of Green Belt exchange in relation to development on the edge of Bristol.
OFFICER RESPONSE

Paragraph 84 of the National Planning Policy Framework requires plan making to consider the implications of development directed towards or away from Green Belt. This is directly addressed in section 4 of the topic paper on The Formulation of the Emerging Spatial Strategy and the Emerging Spatial Strategy’.

The wide ranging views from stakeholders is strong evidence that there is no single or simple answer on how to accommodate the needs of the sub-region. There have been recent government announcements through the Housing White Paper on the tests which will be incorporated into national policy and will need to be applied when considering whether it is appropriate to consider land within the Green Belt for development. The next stage of the JSP will need to take into account the implications of any national policy revisions alongside the results of the consultation. This will enable the UAs to review the strategy and the evidence and make any necessary adjustments that are considered appropriate in the preparation of the Regulation 19 Draft Plan.

OTHER ISSUES

Other issues which were commonly raised in relation to question one included:

- The impacts of Brexit on housing need and the economy.
- Consideration of brownfield /urban land and sustainable locations in the first instance.
- That housing development should be located next to employment areas.
- That infrastructure and services to be put in place before homes.
- Comments regarding the issue of sustainability and how it needs to be a priority and woven through the JSP and JTS.
- Whether there is an over reliance on urban living in the document.
- Comments on various environmental issues (low carbon, loss of open space, climate change, pollution, loss of wildlife, ecological assets etc).
- That the strategy is disconnected from the locations where the growth is required and does not address the needs on a local level.
- Themes considered to be either absent or under-represented in the JSP include energy, food, health needs and nature resources.
• That a stronger evidence base is needed in certain areas (such as pollination and flood defence) to ensure nature is safeguarded.

• The issue of land banking.

• Comments regarding the content of the NPPF, existing plans as well as Neighbourhood Development Plan’s and the relationship with the JSP.

• Further clarification may be needed on the relationship between the JSP and the housing requirement figures in the extant Local Plans.

SUGGESTIONS OF ALTERNATIVE APPROACHES INCLUDED:

• New settlements and neighbourhoods.

• Plan growth around train stations with routes into the City and the outer major employment areas in North Bristol.

• Phased focused approach to development.

• Redevelopment of existing older housing stock and renovation of unoccupied properties.

• Take account in housing delivery statistics of extra habitable space resulting from house extensions.

• A strategy to implement a scheme that encourages and assists owners of existing larger homes where there is unused space to convert to maisonettes.

• Consult local parishes and towns to audit their housing need with Housing Associations building houses for rental, offering long term, secure tenancies.

• Developers need to tender for housing on sites in the JSP to a known size, quantity and density.

• Greater consideration needs to be given to creating opportunities in less congested parts of the country.

OFFICER RESPONSE

All the views expressed are noted and will inform the next stage of the draft JSP. The next stage of the JSP will need to take into account the views expressed through the consultation. This will enable the UAs to review the strategy and the evidence and make any necessary adjustments that are considered appropriate in the preparation of the Regulation 19 Draft Plan.
How can we increase the delivery of homes, in particular much needed affordable homes in the West of England?

OVERVIEW

Over 700 responses were made with regards to this question. Responses came from the following stakeholder groups:

- Individual members of the public - 600 representations
- Development industry - 62 representations (including Home Builders Federation Ltd (HBF), National Housing Federation South West Housing Associations and Registered Providers (HARP) Consortium, landowners and developers including: Nash Partnership, Bloor homes, Redrow Homes Taylor Wimpey).
- Local government and parish councils - 39 representations (including: Parish councils and political groups for example Bath Liberal Democrats).
- Prescribed bodies - 20 representations (including: Directors of Public Health, Wessex Water, Natural England and West of England Local Nature Partnership (WENP)).

The key themes raised in relation to housing delivery were in reference to affordability and the overall housing target:

- Affordability issues general - Raised 178 times
- Affordable housing numbers - Raised 88 times
- Enforce affordable housing quotas - Raised 110 times
- Overall housing number - Raised 49 times.

In reviewing measures and actions to combat the issues of deliverability, the most common themes raised included:

- Delivery mechanisms and tenures i.e. co-ops, self-builds, starter homes - Raised 121 times
- Planning process (funding, approvals, system changes) - Raised 116 times
- Government involvements/new policy - Raised 71 times

Other constraints in reference to delivery of homes included:
- Infrastructure implications - Raised 255 times
  - Pressures on transport infrastructure - Raised 189 times
  - Pressure on other infrastructure - Raised 66 times
- The use of green belt land - Raised 107 times

### OFFICER RESPONSE

JSP currently provides the framework to deliver up to 105,000 additional new homes in the West of England by 2036. Of these, around 32,200 (30%) need to be affordable homes, predominantly for social rent with some need for affordable rent and low-cost homeownership options. This is based on people spending no more than 35% of their gross household income on their housing costs (without housing benefit).

The challenge of boosting affordable housing delivery is considerable and there are no easy solutions as it equates to over 1,600 affordable homes each year, requiring us to almost double what has been achieved since 2006. At the time of the consultation we projected that just over 17,000 affordable homes – 53% of what we need would be delivered, based on historic trends, and an assessment of the likely impact of government policy changes (e.g. Starter Homes). Since then, the Government issued the Housing White Paper, which proposes a different mix of policies to boost housing delivery across all tenures. As a result, of these policy changes our projection would increase to the order of 23,500 (73%). Further work will be undertaken on the other suggested approaches to increase affordable housing that were put forward through the consultation to inform the next draft of the JS, which will set out our proposed approach on affordable housing delivery.

The four Unitary Authorities have invited the development industry, housing professionals, government departments/agencies, and community representatives to help explore the options for boosting the supply of affordable housing to make sure that all stakeholders doing everything possible to meet the shortfall.

We intend to publish this work as part of the evidence base to inform the next stage of the JSP, which will also directly inform and influence how we take forward the commitment to increase affordable housing in the next version of JSP.
AFFORDABLE HOUSING

The key issues raised in relation to the delivery of homes within the West of England (WoE) were focused around the matter of affordability. Over 170 representations were made in relation to this issue, with the majority of responses from members of the public/parish and town councils (140), followed by the development sector (20), business community and prescribed bodies under the Duty to Cooperate (DtC).

MEMBERS OF THE PUBLIC/ PARISH AND TOWN COUNCILS

Responses specifically referenced the JSP locations, outlining strong concerns over the scale of building proposed, and exemplifying localised issues within these areas. There was acknowledgement of the agreed need for Affordable Housing (AH) as a critical issue and the need to build more AH for young people. Comments included:

- General need to build fewer houses, notwithstanding the current high costs/ limited access of housing for many people.
- Provision of additional funding to assist developers in meeting the AH requirement.
- Building techniques to reduce build cost e.g. structured insulated panels, building densities.
- Affordable housing should be situated closer to employment areas.
- Poor descriptions of AH within the consultation document.
- The Unitary Authorities should be proactive in challenging viability assessments to ensure that planned levels of affordable housing are achieved.

DEVELOPMENT SECTOR

Key concerns raised by the development sector (namely representatives from Taylor Wimpey, Bloor Homes, Bovis, Nash Partnership, Crest Nicholson) identified that in addressing the issue of affordability, the issue of sustainability cannot be omitted and therefore building near employment locations was essential. Allocating land in the right place for AH development and in particular seeking to address ‘affordable need’ through a Site Specific Allocations Process was considered advantageous.
BUSINESS COMMUNITY/ OTHER RELEVANT BODIES

The business community (including representation from Business West and the Federation of Small Business) noted the need for a new spatial model that would focus AH within urban areas and near employment centres.

OFFICER RESPONSE

The wide range of stakeholder viewpoints is strong evidence that there is no single or simple answer to how to make housing more generally affordable and accessible to many people. In preparing the next along with overall development viability issues. This will involve testing affordable housing provision against a range of development scenarios. Undertaking this further work will help to ensure levels of affordable housing are robust and there is clear evidence to justify delivery as part of presenting the JSP going forward. AH is required on all sites above relevant thresholds in order to create mixed, balanced and sustainable communities. For the next stage of the JSP further technical work is being undertaken to look at locational sustainability.

THE AFFORDABLE HOUSING TARGET

70 respondents felt that the affordable housing target was too low. The majority of these respondents were members of the public/parish and town council (45); development sector (22) and the business community (3);

Members of the public in general disagreed with the prospects of delivering AH within their particular locality, primarily listing issues in relation to poor transport infrastructure and access to employment centres leading to higher costs of living. Other points included:

- The need to fully involve housing associations in planning decisions
- The need to put pressure on ‘big developers’ to meet AH targets

The development sector and business community outlined that current housing proposals were not sufficient and the Objectively Assess Need (OAN) needs to be raised, which in turn allows more AH to be delivered, referencing the National Planning Policy Guidance (NPPG) section: ID: 2a-029-20140306.

Additional comments included:

- The need to plan positively e.g. through ‘garden villages’
- Need to change the thresholds for strategic sites and look at smaller sites of 250 dwellings
- More housing with a dynamic and coordinated approach to deliver AH, adopting a mix of measures such as innovative construction solutions (e.g. Modular housing)

- The need to consider starter homes within AH contributions

- Affordable homes need to be closer to employment areas.

- Lack of evidence on AH within the JSP document

- Potential new mechanisms that could be delivered through devolution, which offers an opportunity to put in place new delivery mechanisms i.e. West of England Delivery Board.

Directors of Public Health outlined the need to link to site viability assessments and the potential to introduce 100% AH sites identifying concerns around the risk of embedding and compounding socioeconomic and health inequality, whilst increasing demand on local health and social care services.

10 respondents felt that the affordable housing target was too high. Views were principally expressed by members of the public, parish and town councils:

- All AH should be delivered within the large cities or around major employment hubs.

- Need to build houses that are protected from climate change and energy efficient,

- Responses disagreeing with the concept of affordable homes which implies small poorly built dwellings.

**OFFICER RESPONSE**

Government policy requires local planning authorities to plan proactively to meet as much of their housing needs in their area as possible, including market and affordable housing, evidenced by the Strategic Housing Market Assessment. There is no one-size-fits-all approach and it will be appropriate for local authorities to deliver a mixed package of affordable housing of all tenures that can respond to local needs and local markets. This will involve working with partners and key stakeholders to deliver a range of affordable housing products.
ENFORCE AFFORDABLE HOUSING QUOTAS

Over 100 comments were made outlining the need to enforce AH quotas. Those that responded to this issue were predominantly from the following stakeholder groups: members of the public, parish and town councils, and prescribed bodies. Support was expressed for imposing penalties for failing to deliver within predefined timescales. This concept was often followed with comments outlining the need to allocate sites for affordable housing provision only. Other comments included:

- Authority owned land should be used solely for affordable housing.
- Enforce a minimum target on a region wide basis
- Grant only permission where the target AH percentage is agreed
- Using the existing housing stock to create the ‘Affordable Housing’
- A grant permission for Affordable Homes, where there is employment opportunity
- Site Specific Allocations for Affordable Housing only was supported by prescribed body comments namely from Wessex Water and Directors of Public Health.

Responses from the business community reflected the need to increase the overall number of housing being built which in turn increases proportions of affordable housing built.

Other comments included:

- Ensuring that houses are built primarily on brownfield sites
- The JSP should include specific policies to ensure, that local authorities in the West of England are able to speed up building rates on sites with planning consent
- In particular the National Housing Federation outlined; the use of review mechanisms within Section 106 agreements to enable greater levels of affordable housing in later phases of schemes if performance exceeds the expectations set out within the viability assessment. The use of Supplementary Planning Documents to set localised conditions and criteria for viability assessments; and taking a flexible approach to tenure.
OFFICER RESPONSE

Boosting the delivery of affordable homes is one of the key challenges that we face in developing the Joint Spatial Plan (JSP), and the evidence shows that 32,200 affordable homes are needed between 2016-36. Unless we change the way deliver these, and/or find new ways of boosting supply, the assessment is that we will only achieve 23,500 affordable homes -73% of what we need. We will need to do a number of things differently as it is clear that:-

- The challenge of boosting affordable housing delivery is considerable and there are no easy solutions.
- It is critical to bring in some kind of subsidy, either public subsidy or developer subsidy.
- Site viability is key, especially given the Plan’s proposed focus on urban and brownfield sites.
- A suite of measures is required to boost delivery including incentivising existing developers and new entrants into the market to build more

The technical evidence paper being prepared to support the JSP will set out these and other points in more detail. The objective is to build as far as possible a consensus on how to support increased and sustainable levels of affordable housing delivery, while maintaining sustainable patterns and forms of development.

OVERALL HOUSING NUMBER

When discussing delivery rates and AH, comments were often made with regards to the overall market housing number itself. Over 40 responses indicated that the overall housing number was too low. The majority of responses were from the development sector, followed by members of the public and the business community. The predominant themes arising included:

- Need to significantly increase the overall level of housing completions across the whole Plan Period, outlining that the level of housing was not sufficient to meet the full OAN.
- Lack of evidence to support the argument that it is unrealistic to meet full need for AH.
- Need to review the strategic development location size threshold to which the development sector felt that it should be 250 with more strategic sites.
Development Sector responses from Taylor Wimpey, Crest Nicholson, Bloor Homes, Bovis Homes and Nash Partnership, all identified that the level of housing presented within the JSP was not sufficient to meet the full OAN for the WoE. Examples from Bloor Homes expressed an OAN of 140,310 with similar approximations suggested from the other above mentioned organisations. These comments were supported by Business West, a representative of the Business Community.

6 responses indicated that the overall housing number was too high (solely made by members of the public) identifying;

- Increases in housing encourage poorly designed development.
- Small increases are required but not of the levels outlined in the JSP and not to a degree that would create sustainable issues

**OFFICER RESPONSE**

While increasing the overall housing requirement number would have some effect on increasing affordable housing, this is not by itself a sufficient or risk-free solution. Evidence prepared by West of England makes it clear that there is a tipping point whereby a higher overall housing requirement simply becomes an undeliverable housing quantum with an imbalance between homes and jobs, which may mean housing sites just don’t come forward. An over-supply of market housing, beyond identified need, which is a consequence of this option also brings a risk of increased in-migration, potentially in excess of available jobs. Notwithstanding the disagreement with the development sector/stakeholders as to the merits of this, which will clearly be an issue for the JSP Examination in Public (EiP), a suite of options is required, with carrots as well as sticks. Going forward there is potential to think creatively, it will be appropriate for local authorities to deliver a mixed package of affordable housing of all tenures that can respond to local needs and local markets. This will involve working with partners and key stakeholders to deliver a range of affordable housing products.

**ACTIONS TO IMPROVE THE DELIVERY OF HOMES**

**Reviewing the planning process**

Of the actions suggested to improve the delivery of homes, most comments suggested reviewing the ways in which the planning process could be utilised and/or amended (over 170 responses). The majority of responses were from members of the public, parish and town councils, the development sector, the business community and prescribed bodies.
Members of the public outlined the need to prevent developers from ‘land banking’. Various comments from parish councils and town councils as well as political groups, suggested ways to enhance the process included:

- Promoting benefits for developers to develop their sites at an increased rate.
- Focus development in areas where infrastructure investment is already taking place
- Enforcement of planning agreements
- Supported a more diverse mix of development opportunities
- Making better use of existing empty dwellings.
- Addressing the 5-year supply issue,

The development Sector (in particular responses from Aston and Co UK Ltd; Bloor Homes; Blue Cedar Homes Limited and Gleeson Strategic Land), suggested similar options to those mentioned and commented on:

- Innovative construction solutions (such as modular housing) which can be built quickly and efficiently.
- Potential new funding options from devolution
- Adding a Planning Policy context for the delivery of ‘garden villages’ considered as capable of delivering housing at high delivery rates.

The response on behalf of the Housing Associations and Registered Providers (HARP) consortium additionally noted the authorities should consider reviewing the planning process and introducing a blanket affordable housing requirement in the West of England Joint Spatial Plan, in order to ensure the affordable housing need of 32,200 dwellings is delivered.

Directors of Public Health identified the need to introduce Compulsory Purchase Order (CPO) powers and commented that the JSP should include specific policies to ensure that local authorities in the West of England are able to speed up building rates on sites with planning consent.
OFFICER RESPONSE

As reported above, the challenge of boosting affordable housing delivery is considerable and there are no easy solutions. However establishing a consistent approach to site viability, backed up by planning policy, with a review mechanism to capture a share of land value uplift has considerable potential and merit. Further technical work is needed on the detailed aspects of this approach which will be taken forward as part of the technical evidence paper being prepared to support the JSP.

CHANGING DELIVERY MECHANISMS AND TENURES

Over 100 comments outlined the prospects of changing delivery mechanism and tenures to increase delivery rates. The majority of responses were from members of the public, parish and town councils.

- Imposing penalties for failure to deliver
- Speeding the planning process up through new policy in the JSP
- The need for developers to set delivery rates.

The development industry (comments from Bloor Homes, Curo, Taylor Wimpey, Crest Nicholson and Nash Partnership) outlined that the solution to delivery rates lies in the ability to ensure a wide range of site sizes, providing a flexible approach to tenure, allowing housing associations to deliver a range of affordable tenures.

The business communities (in particular responses from Business West) highlighted the potential impact of devolution in allowing changes to delivery mechanisms. Additional business responses from Triodos Bank outlined the need to consider alternative models for development that do not solely have financial return as their motivation. “What will the JSP do to support and incentivise local authority owned development companies, community land trusts, cohousing groups and many other such models that could serve the regions housing needs better?”.

DEVELOPER AND INDUSTRY INPUT

63 comments were made outlining the need to include developer industry inputs when addressing the issue of housing delivery. From the majority of comments on this matter most were from members of the public, parish and town councils (53), followed by the development sector (9) and prescribed bodies (1) and included:
- Public groups predominantly questioned the ability of the developer industry to actually deliver the 105,000 houses identified over the next 20 years.

- The potential for developers together with the government to introduce another form of 'help to buy'

- Government to incentivise developers to deliver sustainable and desirable developments.

Responses from the developer industry related to the need to support a dynamic and co-ordinated approach amongst the West of England Authorities which adopts a mix of measures such as innovative construction solutions (e.g. modular housing) which can be built quickly and efficiently.

**LOCAL AUTHORITY TO BECOME DEVELOPERS**

Representatives from members of the public (44), the business community (1) and prescribed bodies (1) supported the premise of local authorities developing and delivering sites on this matter and included the need for councils to undertake more house building in brownfield areas such as unused office space.

- Increased council homes in the area was strongly supported

- Compulsory purchase sites and use council capital resources to provide affordable homes.

**GOVERNMENT INVOLVEMENTS AND NEW POLICY**

71 responses supported the need for Government involvement and additional policy support in order to increase housing delivery and address the need for Affordable Housing. The majority of responses on this matter were made from members of the public, parish and town councils (63) and the development sector (8).

- Comments from parish councils often outlined the need for government to develop legislation to ensure developers commit to affordable homes quotas of at least 30%.

- All groups outlined the planning system was not sufficient to deliver affordable homes and there was need for a change in government policy and funding mechanisms to increase delivery of particularly affordable homes.

- Developer industry responses from National Housing Federation and South West HARP highlighted the need for the authorities to update processes once the Housing White Paper is published. It was highlighted that the authorities should consider the outcomes of this paper and the national commitment to substantially increasing the supply of Affordable Housing, including the potential additional government funding outlined in the Autumn Statement.
The business community again identified devolution as an avenue that offers an opportunity to put in place new delivery mechanisms.

**OFFICER RESPONSE**

There is no one size-fits-all approach and it will be appropriate for local authorities to deliver a mixed package of affordable housing of all tenures that can respond to local needs and local markets. This will involve working with partners and key stakeholders to deliver a range of affordable housing products. We intend to publish a comprehensive action plan as part of the evidence base to inform the next stage of the JSP, which will also directly inform and influence how we take forward the commitment to increase affordable housing in the next version of JSP.

**STRATEGIC DEVELOPMENT LOCATIONS**

Several responses (28) identified the need to increase the number of strategic development locations. Representations were made from the development sector and business community with comments also made from members of the public and prescribed bodies under the DtC. Responses reflected the need for smaller strategic sites to be identified, which would increase delivery rates for the JSP as oppose to the current large sites.

Responses from the development Industry (including Barratt Developments Ltd, Bloor homes, Bovis Homes Limited, Gallagher estates and Grass Roots Planning) supported the increase in strategic development locations for the above reasoning but, also highlighted the plausibility of a site they are representing.

Wessex Water outlined the need to allocate sustainable locations close to employment and retail as well as near to major Highway Networks or planned infrastructure improvements to, provide a range of deliverable sites to boost housing supply.

**OTHER CONSTRAINTS IN REFERENCE TO DELIVERY OF HOMES**

**Green Belt**

57 responses specifically outlined Green Belt land should not be used and 46 responses outlined the need to use more Green Belt land. Of those who listed the Green Belt as a key constraint in combating the issues of deliverability, the majority of responses were from members of the public, parish and town councils, followed by the development sector and the business community.
Members of the public, the business community and the development sector outlined the need to release Green Belt land due to large amounts of the West of England (WoE) located within the Green Belt and it making a considerable impact on a future spatial strategy. Further comments on this subject included:

- Build houses on the outskirts of Bristol, even at the expense of sacrificing a small amount of green belt.
- Review the Green Belt measured against sustainability.
- Allocate sites in sustainable locations close to employment and near to existing Highway Networks and/or planned infrastructure improvements.

Of those representations that outlined the need to adhere to the Green Belt constraint, majority of responses were from members of the public and the business community and included:

- The need to focus development on brownfield land within the major urban areas
- The need to address the WoE housing need as a whole and not on an individual authority basis, which can lead to unsustainable locations outside of the Green Belt.
- CPRE Avonside highlighted the success of the Green Belt policy in ensuring natural capital, landscape protection and amenity value and encouraging brownfield development.
- Representation from Rolls Royce outlined that limited development should be taken within the Green belt.

**TRANSPORT**

Over 100 representations made specific mention to transport infrastructure as well as relating to the connection between transport and the delivery of major housing sites.

Members of the public commonly referenced infrastructure issues within a specific proposed development sites were unsustainable and required significant transport investment thus, affecting delivery rates.

- Friends of Suburban Railways: supported the urban intensification aspect of the JSP and provision of new homes in areas with existing transport links.
- Nailsea Action Group: suggested that development within Nailsea will lead to out commuting to Bristol for work, due to poor access to public transport this will lead to unsustainable levels of development.
Charfield Parish Council: highlighted that transport and housing development will lead to greater commuting distances and car based travel.

Jarvis Jefferies Architects LLP: identified affordable homes should be in affordable locations close to existing main employment centres and well connected to alternative public transport modes such as rail, bus or tram that offer a range of public transport routes to various destinations.

From the 10 strategic development locations in the Emerging spatial strategy, comments were steered toward transport issues in Charfield (raised 40 times) as well as in Nailsea and Backwell (raised 11 times). Responses also included comments for Thornbury (raised 7 times), Buckover (raised 6 times), M5/A38 corridor (raised 4) and Keynsham. Responses highlighted that:

- Houses need to be located where infrastructure is in place to support development
- The JSP should choose locations with good transport links to employment opportunities.
- The impact on the environment

References to other infrastructure provisions and pressures included:

- Concerns over potential pressures added to local schools, hospitals and GP surgeries. These are currently inadequate to support the population and creating an issue for delivery of strategic development locations.
- Spread development over more strategic development locations increasing delivery as fewer ‘major’ infrastructure improvements would be required.

**OFFICER RESPONSE**

A key objective of the JSP is to establish the most appropriate spatial strategy to accommodate the level of growth in homes and jobs required in the West of England up to 2036. The final number and spatial distribution of strategic development locations (SDL), the extent to which this requires changes to the general extent of the Green Belt, and the reasonable prospect that appropriate infrastructure can be delivered either before or at the same time to support sustainable communities, will be determined through the testing and scrutiny of the Plan’s overall spatial strategy. These issues are considered in more detail at Questions 5 and 6. Notwithstanding this, every SDL will need to be robustly assessed as to its ability to deliver on site affordable housing. As reported above this will involve development viability to test affordable housing provision against a range of development scenarios. Undertaking this further work will help to ensure levels of affordable housing are robust and there is clear evidence to justify delivery as part of presenting the JSP going forward.
Does the proposed strategy make adequate provision to address the economic and employment needs of the West of England?

OVERVIEW

Over 600 responses to this question were received. Multiple responses (75) agreed that the strategy makes adequate provision to address economic and employment needs. Nevertheless, the majority of responses (338) did not agree that the strategy makes adequate provision to address economic and employment needs suggesting on a local basis (e.g. large proportion of objections to Nailsea/Backwell, Mendip Vale and Charfield) that the employment offer was limited.

Approximately 52 people didn’t answer yes or no, with the majority stating that they were either unsure or due to the lack of information or expertise that they were unable to answer the question fully.

The following section sets out the main themes and issues raised by the consultation responses from those in support and those against the proposed strategy. The latter part of the section then concentrates on those comments received from a number of key businesses/employers within the West of England.

RESPONSES IN SUPPORT OF THE STRATEGY

There was general support for the approach towards the economic and employment needs of the West of England (WoE), in particular the expansion of existing towns and settlements which will strengthen existing communities and provide appropriate employment opportunities for existing residents, reducing economic barriers between one community and another. Some concern was expressed however that its emphasis on urban living may result in the loss of existing employment sites.

Responses included were from the following groups:

- Local residents (73% of those responded)
- Highways England
- Parish/Town/District Councils (6)
- Consultants/Developers (6)
- Housing Associations (Solon/Curo) (2)
- Interest groups (4)
Reasons for their support for the proposed strategy included:

- The WoE is recognised as the location for a number of blue chip financial institutions and hosts a thriving aero industry and science park for new technologies. In order for these business to grow, housing is vital.

- The strategy in terms of employment growth is aligned to the Strategic Economic Plan (SEP), and focused at the Enterprise Zones and Areas and South Bristol. These areas have the capacity to provide over two thirds of the identified employment growth. The rebalancing of employment growth away from the North fringe of Bristol is welcome in helping to address inequality issues in South Bristol. Overall provision looks more than adequate, particularly in the light of the predicted downturn in UK economic growth in the short to medium term.

- Highways England supports the provision of new employment development to meet the identified need and note that it is desirable that the locations for this are close to residential development in order to help reduce the need and distance of travel for commuters.

- The identification of The Somer Valley as a strategic employment location is welcomed as is the strategic priority to focus on economic rebalancing and addressing unsustainable commuting patterns by aligning jobs and homes.

- A particular respondent suggested that we have more than enough employment opportunities within the areas but require transport infrastructure to allow the public to access such opportunities without the need for cars.

**RESPONSES AGAINST THE STRATEGY**

A large number of objections commented on the lack of employment opportunities in rural areas proposed for housing. Comments suggested looking to building houses near larger employment areas, otherwise this will result in greater congestion, over reliance on car (transport routes just cannot cope) and despite promises of train stations/public transport improvements, these are unlikely to be used given rural locations (car often required to access such services). Suggestions that development should be closer to Bristol/Bath, in particular the Ashton Vale area, or south of Weston-super-Mare, in more sustainable locations.

Responses on this matter included:

- Local residents (91% of those who responded)
- Parish/Town/District Councils (12)
- Consultants/Developers (11)
- Interest groups (6)
- University of Bristol and University of Bath
The following general comments were raised:

- The strategy does not address the longstanding economic problems in South Bristol and Weston-super-Mare by focusing investment in both employment and housing there.

- The JSP is presently under providing in respect of the overall Housing number and, critically, planning to fail in the delivery of Affordable Housing. Additionally, it does not accommodate the economic growth objectives of the Local Enterprise Partnership SEP. As a consequence, the Emerging Spatial Strategy does not make adequate provision to address the economic and employment needs of the West of England (WoE).

- The economic outlook for the JSP area is strong and backed by an active Local Enterprise Partnership (LEP) which has secured funding for a number of high profile employment-generating development schemes. It is vital that the local labour force is able to grow sufficiently to realise this potential and limit unsustainable in commuting from the wider Region.

- Criticism of evidence base leading to considerable doubts on whether the strategy is sufficient to address the economic and employment needs of the West of England i.e. Oxford Economic Plan forecasts, Economic Development Needs Assessment (EDNA), SEP.

- The EDNA was also commissioned pre-Brexit and should be reconsidered in light of the new economic future ahead.

- The plan predominantly focuses on providing more housing and not really about employment and businesses. The plan should focus much more on integrating work places with homes and transport (businesses alongside homes not separated).

- There appears to be an emphasis on developing the economy and jobs in South Bristol and yet the Emerging Spatial Strategy promotes house building to the north. This may be affected by the ambition to preserve the green belt but it has huge consequences for other aspects of the environment, eating into the countryside that is not designated as green belt and with the prospect of inadequate and highly polluted transport corridors.
OFFICER RESPONSE

The JSP aims to ensure that appropriate economic and employment land is provided for across the WoE in response to the future distribution of the housing target of 105,000 new homes, and to meet the job aspirations of the Strategic Economic Plan consistent with this number. Evidence provided through the Economic Development Needs Assessment has confirmed that there is adequate land for future jobs growth across the WoE. However, whilst the employment capacity of the existing distribution of Strategic Employment Locations of employment land has been supported by the evidence, additional employment land capacity has yet to be quantified at the Strategic Development Locations.

Further capacity and clarity on distribution of employment opportunities in response to the confirmed spatial strategy will be provided in the draft Joint Spatial Plan to be published in the autumn. This will help to address the concerns in relation to the location of housing growth and proximity to employment opportunities in South Bristol and in some of the more rural areas.

STRATEGIC BUSINESS STAKEHOLDERS WITHIN THE WEST OF ENGLAND

Key business groups and major West of England employers and sectors raised the following main issues:

Joint working across boundaries

South Bristol Business (an informal group of businesses to improve the economic development of South West and South East Bristol)

- The economy of the South West remains to be improved and in closing the gap between South and North Bristol, a dynamic long term economic plan and programme is necessary.

- Believe that the economic expansion will only be achieved on the scale required through cross boundary working with North Somerset and B&NES (as it cannot be met from within the City of Bristol South Boundary) and the production of a South Bristol Economic Plan.

Bath Chamber of Commerce and the Initiative in B&NES

- Recognise the scope and geographic limitations of the current work and register a concern about how the plans will link into neighbouring local authority areas. Many businesses in Bath have customers and members of staff in West Wiltshire and the Mendip areas and would like to be assured there is a level of combined thinking which exceeds the boundaries of the West of England.
OFFICER RESPONSE

The four Unitary Authorities are committed to working together to ensure that the needs of the WoE as a whole are met through spatial planning. In addition, in the preparation for the WoE Joint Spatial Plan, the WoE Authorities have sought to engage with the adjoining authorities.

ECONOMIC DEVELOPMENT NEEDS ASSESSMENT AND PROVISION FOR SMALL AND MEDIUM ENTERPRISES (SMES)

**Business West** (Business West Chambers of Commerce & Initiative is the main Business Representation and Leadership Organisation for the West of England representing nearly 22,000 businesses, from new start companies through to the major Private and Public employers including the Universities)

Business West raised considerable issues with the robustness and quality of the Economic Development Needs Assessment (EDNA) evidence base used to support the JSP and commissioned Wessex Economics to prepare their formal response. The points made on behalf of Business West related to:

- Weaknesses in the Evidence Base i.e. EDNA on future employment needs and future employment land allocations. The West of England needs to conduct significant further work in order to help strengthen the current weaknesses in the JSP for addressing its future economic and employment needs.

- The LEP’s Sub-regional responsibility for economic development, should also take on an element of responsibility to ensure the work undertaken by the Unitary Authorities is robust.

- The initial EDNA failed to sufficiently consult with the business community and therefore understand the requirements of occupiers and developers or have a full enough understanding of market demand and supply issues.

- The EDNA and JSP documents appear to suggest that the existing stock of land/floorspace is sufficient. In Business West’s opinion, this is not ambitious enough to ensure that existing key areas are allowed to expand and that new employment locations are identified and supported.

- There is an imbalance between employment and housing provision.

- Reliant on the over optimistic assumption that there will be a surplus of employment land and relying too heavily on Avonmouth and Severnside as a source of future employment land.
The assumption of a rebalancing of Use Classes within particular geographically defined sub markets, the JSP assumes that there will also be a rebalancing between geographically defined sub markets. This finding that it is possible to ‘rebalance’ undersupply in one part of the market within the WoE area with oversupply in another is considered to have potentially serious shortcomings.

The emphasis in the Emerging Spatial Strategy on Brownfield development to meet the WoE future housing needs, means it is therefore particularly important to get the balance of employment and residential land right, and to ensure the Evidence Base underpinning future employment land supply is robust and forward looking.

The JSP relies on a Strategy of delivering future employment growth almost entirely within the framework of Enterprise Zones (EZs) and Enterprise Areas (EAs). Such a focus on EAs and EZs raises two concerns, firstly whether the selected EZs and EAs are able to realistically provide the supply to meet the identified need and secondly what happens to employment areas that fall outside of this EA and EZ Framework.

Concerns the allocations put forward under allocate supply in relation to need in our key City Centre markets thus, meaning there will be a shortfall for example in office provision in Bristol and Bath City Centre’s.

North Bristol SusCom (major employers, located in North Bristol, promoting sustainable commuting including Airbus, BAE Systems, Boeing, Bristol & Bath Science Park, Hewlett Packard Enterprise, MOD, North Bristol NHS Trust, Rolls Royce plus many more)

Considers the assessment relies very heavily on surplus land at Avonmouth, which requires significant infrastructural investment and will only be suitable for certain businesses and does not examine what the growth projections are for individual businesses.

Would like to see safeguards introduced to secure other employment areas, not just the Enterprise Zone (Bristol) and Enterprise Area (Bath) (the allocations of which are too small when compared to the level of need identified).

The WoE should look at how they might provide sites to attract future growth industries, and in addressing some of the current economic imbalances in the area i.e. South Bristol and the Airport should be considered as a Strategic Employment Location.

Federation of Small Businesses (represents small and medium employers (SMEs) nationally)

Consider that it is failure of the Emerging Spatial Strategy not to consider small businesses as an integral part of the Strategy when evidence indicates that most employment growth (up to 86%) is from small businesses alone and ask the WoE to re-think the strategy to include large and small businesses as an overall mix in order to achieve a joint spatial strategy that is balanced.
• Request to examine the economic evidence and emerging Government Policy, and then propose a draft plan based upon evidence which illustrates that small business will be at the heart of economic growth.

Home Builders Federation (HBF)

• Concerns about the under estimation of Objectively Assessed Housing Need (OAHN) for both the BANES and Wider Bristol HMAs remain. HBF’s opinion is that the JSP will not make adequate provision to address the housing needs of the WoE nor increase the delivery of affordable housing. Therefore the strategic priority “to meet the need for housing and accommodate the economic growth objectives of the LEP Strategic Economic Plan (SEP)” will not be achieved.

• A consequence of under estimating housing needs will constrain the economic growth of the region undermining the ambitions of the LEP so the sub region becomes less competitive with problems associated with labour supply, recruitment and retention of skilled workers.

• 105,000 dwellings will support jobs growth of 82,500 jobs for the period 2016 – 2036. Concern that this revised interim figure continues to demonstrate a misalignment of homes and jobs which will not fully support economic growth.

• Whilst the LEP SEP is formulated on the Oxford Economics baseline forecast, the LEP remain committed to ambitions for higher levels of growth than the baseline. The OAHN is both below this baseline projection and the higher ambitions for growth. The EDNA also identified that higher economic growth is possible. If the JSP is to deliver economic growth then its strategies for homes and jobs should be consistent and integrated.

Institute of Directors (IoD) South West (represents some 2,500 Directors and entrepreneurs across the 7 counties of the South West Region, over 500 of whom live and work in the West of England area)

• Concerned that there is a lack of a proper consideration of future employment needs and provision for future employment land that the region will need if our businesses are to grow and create new jobs and wealth.

• The Evidence Base is weak and focuses too much on an Assessment of ‘top level’ supply. This top level Assessment relies too heavily on surplus land at Avonmouth, which requires significant infrastructural investment and will only be suitable for certain businesses. It does not examine what the growth projections are for individual businesses or sectors or how the West of England might provide the sites to attract future growth industries.

• Would like to see greater consideration and provision of space to meet the needs for the many smaller start-up and scale-up businesses, numbers of which are already significant in the WofE area and likely to continue to grow in future as the digital economy develops.
- Would like to see Planning that encourages the provision of local workspaces which have multiple benefits: reducing travel (and thus congestion), affordability and local visibility of entrepreneurship which has been proven to aid growth. All these support social mobility and thus inclusive growth which is critical for an expanding metropolitan area like the WoE.

**OFFICER RESPONSE**

A number of respondents consider that the evidence to support the future employment needs in the WoE is inadequate and that the location and distribution of Strategic Employment Locations does not provide for a balanced future growth to support housing across the WoE.

This evidence, set out in the Economic Development Needs Assessment (EDNA) March 2016 is a revision to the original EDNA published in 2015 to reflect revised growth forecasts commissioned from Oxford Economics in 2015. This has been published and confirms that there is adequate land to accommodate the projected needs for employment of the WoE taking into account the aspiration set out in the Strategic Economic Plan and the housing delivery target of 105,000. The EDNA has taken into account the needs of small businesses as well as large businesses, and the Spatial Strategy is predicated on the need of all sectors of business in the WoE. The implications of BREXIT are not yet known and a review of the evidence available would be too soon to bring any additional confidence to the results.

Further workshops are to be undertaken with the business community to examine local evidence and any strategic implications for the JSP will be incorporated. More explicit reference to the role of SMEs should be included.

**West of England Public Health Partnership**

- It is clear the proposed strategy has been prepared with consideration to the EDNA and SEP and economic prosperity is a key determinant of health.

- Despite the JSP aiming to ‘close the gap’ between the most advantaged and disadvantaged communities and ensure the JSP benefits all sections of communities. Concerns have been expressed about risk that market forces may exacerbate and widen existing inequalities by concentrating development benefits in already prosperous and attractive areas.

- The Emerging Spatial Strategy is light on information about how aspirations to balance the economy with greater development opportunity in economically deprived areas. Recommend that for the JSP to achieve its vision, there needs to be a greater focus on how the proposed rebalancing of the economy will be achieved across the WoE area.
There is little emphasis on the role of employment in achieving health and wellbeing outcomes in the current document, or the importance of ensuring economic development promotes high quality job creation in communities.

A key principle of the emerging JSP in relation to access to employment is effective economic development in the designated Local Enterprise Zones (LEZs). This needs to be balanced with the need for mixed land use in the SDL areas to encourage local economic development through commercial, retail and industrial development.

Local Joint Strategic Needs Assessments (JSNAs) include assessments of local health and wellbeing needs associated with employment and economic development and it is not clear that these documents have been used alongside the EDNA and SEP in determining the employment needs of the WoE that the JSP will be well positioned to address. Recommend using JSNA summary data on health and wellbeing needs relating to employment, prosperity and income equality to support further development of the JSP.

**NHS and Public Health**

Requested to continue to be included in the JSP Plan discussions to review current and future NHS premises utilisation, condition and functional stability, as well as reviewing regularly and refreshing the Public Health Joint Strategic Needs Assessment.

**OFFICER RESPONSE**

The significance of a strong local economy and employment opportunities to maintaining the health and wellbeing of the wider community is recognised and has been taken into account in the assessment of impact of the spatial strategy. It is recognised that greater reference could be made to this issue.

Further capacity and clarity on distribution of employment opportunities in response to the confirmed spatial strategy will be provided in the draft Joint Spatial Plan to be published in the autumn. This will help to address the concerns in relation to the location of housing growth and proximity to employment opportunities in South Bristol and in some of the more rural areas.

**ADDITIONAL STRATEGIC DEVELOPMENT LOCATIONS**

**Bristol Airport**

Bristol Airport supports the positive plan-led approach, the Proposed Vision for the WoE, and the four Strategic Priorities.
It is essential that a sound sub-regional plan recognises and builds upon the Airport’s role as the primary international gateway for the WoE, a major generator of local jobs, and a key transport hub serving the region and the UK. Would contend strongly that this unique status should be reflected within both the policy framework of the adopted JSP and the implementation priorities of the Joint Local Transport Plan (JLTP).

Specifically, and fundamentally, Bristol Airport seeks recognition within the JSP as a Strategic Employment Location. Such development plan status would assist greatly with the delivery of planned, phased, sustainable growth of infrastructure and jobs through the plan period.

Recognises the quantum and quality of jobs must complement the JSP’s wider employment growth strategy. Evidence to be submitted to the Publication Plan will therefore be set within the context of the sub-region’s Economic Development Needs Assessment (EDNA) and the SEP. Evidence will also address the principles of sound plan-making as they relate to the demand and supply of employment opportunities both within North Somerset, and other areas of the sub-region, including the meeting of needs of South Bristol and Fringe.

The significant potential for complementing and enhancing the sub-region’s strong aviation engineering sector, including in relationship to training, education, apprenticeships, and research & development will also form part of the detailed submission.

The draft JSP and JTS documents indicate a growing rather than a fully formed appreciation of the importance of Bristol Airport and its critical role of sub-regional connectivity and economic strength. The recognition of the need to address the deficit in essential regional infrastructure along the A38 corridor is welcomed but the Airport’s current and potential position as a major component of the West of England’s transport network, international status, reputation, and long-term economic performance is not reflected in the Emerging Spatial Strategy.

Seeking to deliver additional capacity to meet the travel needs of the sub-region and the wider South West and South Wales through the 2020s and 2030s, and believes that formal recognition of its status as a Strategic Employment Location is an essential prerequisite for its continued evolution into a sustainable transportation and economic hub for the WoE and beyond.

Bristol Port Company

Unconstrained access to the Strategic Highway Network and rail network are essential for the operation of the Port and welcomes the search for solutions to mitigate existing problems on the Highway Network through the Transport Plan as well as addressing the long-term needs of continuing growth and development through the JSP.
The JSP should acknowledge the implications of the National Policy Statement for Ports (2012) which confirms that ‘the provision of sufficient sea port capacity will remain an essential element in ensuring sustainable growth in the UK economy’ (Para 3.1.4) and concludes that there is a ‘compelling need for substantial additional port capacity over the next 20-30 years’ (Para 3.4.16).

A Strategic Policy in the JSP to support the development needs of the Port as a Strategic Employment Location with a review of the general extent of the Green Belt would set the context that JSP will take full account of the operational and expansion needs of the Port.

The Bristol Port Company takes some encouragement from the JSP that additional highway capacity at M5 Junction 19 will not be absorbed by additional residential development in Portishead which is not identified as a Strategic Development Location, whilst the Port is identified as a Strategic Employment Location.

It would be helpful to show both Royal Portbury Dock and Avonmouth as Strategic Employment Locations and to clarify in Table 2 that whilst capacity constraints at M5 Junction 19 may constrain housing development in Portishead, they should not constrain the development of Royal Portbury Dock.

The approach of the EDNA to employment land requirements is very broad-brush. It is important to recognise the Port has specific operational land requirements that can only be met on land adjacent to the Port. A reference in the JSP (Paragraph 49) to ‘a relative oversupply of development opportunity at land at Severnside’ should not be taken to apply to the Port.

University of Bath

The University of Bath has a critical role underpinning economic growth in the City and the Region. It specialises in the STEMM subjects: science, technology, engineering, mathematics and management, which are a particular focus for the WoE LEP, and consequently supports the UK’s knowledge-based economy.

The role of the University in generating economic development in the city and wider region needs to be properly reflected in the JSP, particularly in the provision of sufficient high quality employment land that is well served by the necessary supporting infrastructure in Bath, as well as other key locations around the region.

This will require land to be released from the Green Belt around the city to accommodate some of the housing, employment and/or university related development required to meet the identified needs and relieve the acute development pressures that currently exists. This strategy and approach will ensure essential development required to ensure the socio-economic wellbeing of the City in the long term can be delivered.
OFFICER RESPONSE

The Bristol Airport and Bristol Port noted the significant employment growth potential that they provide and consider that these locations should be identified as Strategic Employment Locations.

Growth at the Airport and Port would both require future change to change to existing green belt designation in the Local Plan, both would have implications for the strategic highway and would provide for additional employment opportunities for area in need of support notably with provision from the Airport for jobs to support employment need in South Bristol. University of Bath also seeks the release of Green Belt land to support economic growth.

Further capacity and clarity on distribution of employment opportunities in response to the confirmed spatial strategy will be provided in the draft Joint Spatial Plan to be published in the autumn. This will help to address the concerns in relation to the location of housing growth and proximity to employment opportunities in South Bristol and in some of the more rural areas.

RETAIL EMPLOYMENT

Bristol Alliance Ltd Partnership (Cabot Circus)

The Alliance supports the preparation of a strategic plan for the sub-region, however would re-iterate;

- The JSP should include retailing, leisure and town centres as a separate topic/policy area, or as a sub-set of policies relating to the economy and economic growth.
- The evidence base for the plan should include the requirements of retail and associated sectors as part of the EDNA, and needs should be assessed both sub-regionally and in each local authority plans.
- The JSP plan should include strategic policies that reflect the ‘town centres’ first’ principle, and which protect established centres from harmful retail and investment impacts. Strategic policies should also encourage and facilitate the regeneration of existing town centres.
- The plan should include a clearly defined sub-regional shopping hierarchy.
- The role of The Mall RSC at Cribbs Causeway should be examined through the emergence of the plan and the outcome reflected in the sub-regional hierarchy.
OFFICER RESPONSE

The work on the JSP has not separated out evidence on this issue and it is not intended to include this in the policy base. A commitment has been made to undertake a separate joint retail study which will be reflected in the review of Local Plan Policy.

The approach to the location of retail development in town centres and the constraint on out of town retail development is set and confirmed by the National Planning Policy Framework and does not need reiteration in the JSP. (NPPF para 24)

The WoE Retail baseline retail study to be jointly commissioned in due course will bring forward additional evidence to support the development of a retail hierarchy once the spatial strategy and SDLs have been confirmed.

RELATIONSHIP WITH TRANSPORT INFRASTRUCTURE

University of Bristol

- There is an obvious lack of connection with the wider housing spatial strategy and Joint Transport Study (JTS). Whilst there may be sufficient land available to meet the identified need, the four authorities need to demonstrate that it is in the right locations that can contribute to and make use of planned infrastructure, and most critically meet the demands on inward investors. Having an abundance of land supply in locations that won’t attract investment is of no value to anyone.

- There is a clear disjoint between the housing and economic development strategies which cannot reasonably endure.

Bath Chamber of Commerce and the Initiative in B&NE

- Welcomes the designation of an Enterprise Zone/Area for the Somer Valley, but are concerned by the limited improvements to the transport infrastructure and encouraged the proposals to improve the vital A4 road link between Bath and Bristol.
OFFICER RESPONSE

The capacity for delivery of growth at Strategic Development Locations and at the Strategic Employment Locations will need to be sustained by transport investment. Clarity on the essential strategic infrastructure required and how and when it will be delivered in step with new development will be brought forward in conjunction with the Joint Spatial Plan. Transport infrastructure requirements are being established through the Joint Transport Study and will be brought forward as part of the evidence base to support the next stage of the JSP.

Representations were also received from a number of other well-known business stakeholders within the West of England, many of which highlighted similar themes and issues to those expressed above. Representative groups also emphasised the need for continued engagement with the business community in progressing this Plan in order to ensure a successful strategy that addresses the future economic and employment needs of the West of England.
Does the preferred spatial strategy and the locations identified meet the plan’s strategic priorities and vision?

OVERVIEW

Around 950 respondents answered this question. Over 90 respondents were in general agreement that the preferred spatial strategy and the locations identified meet the plan’s strategic priorities and vision. These respondents included the following stakeholder groups:

- Local residents (73%)
- Environment Agency
- Mendip District Council
- Parish/Town Councils (under 10)
- Developers/those with land interests (under 15)
- Visit Bath
- Local interest groups (less than 5)

Just under half of those who responded were concerned that the preferred spatial strategy and the locations identified do not meet the plan’s strategic priorities and vision. These were from the following stakeholder groups:

- Local residents (85%)
- West of England Nature Partnership
- Natural England
- Highways England
- Parish/Town Councils (around 15)
- North Bristol NHS Trust
- Business community (Business West, Federation of Small Businesses, Rolls Royce, Triodos Bank)
- Bristol University
- Bristol Airport
- Urban design consultancy
- Cotswolds Conservation Board
- Wessex Water Services Ltd
- B&NES, Yate, Sodbury and South Glos Council Liberal Democrats Groups
- Developers/those with land interests (around 25)
- Local interest groups (10)
- Action groups and residents associations (around 5 in total)
Many of the respondents commenting on the strategic locations expressed their objections without relating their response to this question. Detailed comments on the strategic locations are not therefore summarised under Question 4, but picked up elsewhere, mainly under Question 5.

**STRATEGIC PRIORITIES AND VISION**

**Broad support for the Strategic Priorities and Vision**

The following comments have been drawn out for reference or further consideration:

- The continued inclusion of the reference to the rich and diverse environmental character as being integral to health and economic prosperity in the Spatial Plan Vision is welcomed. (Cotswolds Conservation Board)

- Based upon the premise that the housing need is 105,000 dwellings, the preferred strategy is considered broadly to meet the plan’s strategic priorities and vision. However, issues arise should the figure increase, in which case the balance of these priorities and visions may need to be re-assessed (Hoddell Associates, Engine Common Trustees and others).

- The emphasis given to priorities for maintenance of the Green Belt, provision of affordable housing, addressing unsustainable commuting patterns and maintenance/enhancement of environmental quality is welcomed (Abbots Leigh Parish Council).

**Concerns about the Strategic Priorities and Vision**

Those respondents who expressed concern felt the Plan does not meet the strategic priorities and vision for the following key reasons:

- Necessary detail is lacking to judge whether the Plan’s Strategic Priorities and Vision will be met and it should be tied more specifically into the Spatial Strategies of the four partner Local Authorities. (Iron Acton Parish Council)

- Believes that the Vision has been compromised by the desire to meet pre-set timetables. (Compton Dando Parish Council)

- Developing major new communities many miles from the main centres of employment, whilst preserving the Green Belt is not sustainable.

- The Plan is not seeking to address the Full Objectively Assessed Need for housing, therefore not seeking to close the gap infinitum between disadvantaged and other communities. (Charles and Haylie Carr and Wessex Water)
The Plan does not link employment with residential homes thus causing unsustainable travel for many years.

In reviewing the Evidence Base, further justification is required to demonstrate that the locations identified for Strategic Development meet the Plan’s Spatial Priorities and Vision. (Barwood Land)

The Plan should incorporate some form of programme for delivery for supplying 20 years’ worth of housing and development sites, or it cannot meet its strategic priorities or vision. (Campaign to Protect Rural England (CPRE) Avonside)

The Plan needs to ensure that housing delivery happens on the most sustainable sites first and not allow the Green Belt or green field sites to be allocated straight away. (CPRE Avonside)

‘The Formulation of the Emerging Spatial Strategy’ does not accurately interpret the Spatial hierarchy as it fails to address the range of Spatial Priorities, by affording significantly greater weight to one of the ‘Spatial implications:’ ‘Retention of the Overall Function of the Green Belt.’

OTHER KEY OBSERVATIONS

Development industry

The Vision does not specifically refer to meeting identified development needs for housing or economic growth. It is considered that the Vision should be more specific in its ambition for meeting development needs, once the requirements have been fully established and tested at Examination.

Significant concern that there is no clear evidence as to how the Joint Authorities have adopted the methodology, assessed the range of potential development locations and chosen the Strategic Development Locations (SDLs), as described in paragraphs 26 - 39 of the Emerging Spatial Strategy. Also, there is no evidence as to why some locations already identified for development are more appropriate than others within the same settlement, or between settlements, for example whether the loss of Green Belt within Yate could be offset by increased development within Thornbury.

Business West

The process undertaken by the West of England Authorities in producing this Plan has failed to take into account the overriding principle of achieving sustainable development. The implications of sustainable development have failed to guide key decisions on Spatial Locations, transport investment decisions or the role of Green Belt in the Plan area.
West of England Nature Partnership

- The Vision, in setting the tone for where the Plan should be heading, should make more of the need for the Region to develop in such a way that air quality is enhanced, and Climate Change is mitigated through reduced emissions of Greenhouse Gases.

- Given the strategic nature of the JSP, it seems unlikely that the choice of the broad locations identified could contribute in a comprehensible manner to the Strategic Priorities and Vision. So much will depend on the Policies in the JSP that are used to shape development at the locations specified.

Federation of Bath Residents Association (FoBRA)

- The JSP must recognise that there are also significant opportunities for housing development in West Wiltshire with access to employment, education and other services in the city of Bath.

South Glos Council Liberal Democrat Group

- Need a delivery programme for housing development, to ensure the infrastructure will be delivered in the appropriate timescales.
OFFICER RESPONSE

This question relates to whether the preferred strategy and locations meets the Vision and strategic priorities of the plan.

Support for the vision and strategic priorities are noted. It is noted that the reference to the rich and diverse environmental character as being integral to health and economic prosperity was broadly welcomed.

There were a wide range of stakeholder viewpoints, which is evidence that there is not always a consensus view on what the Vision or plan priorities should be. The plan objectives will therefore need to be carefully considered in the round.

It is noted that the reasons listed by those respondents who had concerns reflect:

1. Views that there is not enough of a commitment to meeting the housing and employment needs of the sub-region;
2. That a programme of delivery to set out how the strategy will be delivered is needed;
3. Concerns of sustainability; and
4. Clarity on how the strategy will address reducing inequality.

The strategic objectives do clearly set out the commitment to meet the identified need. The Emerging Spatial Strategy seeks to fully meet the Housing Target and job target. This is documented in the Housing Target paper.

The consultation responses will help to inform a review of the Evidence Base. This will further consider the locations identified for Strategic Development and the Spatial Strategy as a whole, including further consideration of deliverability.

The results of the consultation will enable the UAs to review the strategy and the evidence against the Vision and plan objectives and make any adjustments that are considered necessary in the preparation of the Regulation 19 Draft Plan. This will include emphasising a commitment to the placemaking and Green Infrastructure ‘plans’ to provide further evidence and a basis on which a strategic policy approach will be developed to provide a framework for Local Plans.
KEY COMMENTS ON THE STRATEGIC PRIORITIES

Economic priority

Development industry

- The plan fails to make sufficient provision to address housing needs for market and affordable housing in the West of England and the first strategic priority will not be met.

- Broadly supports the Strategic Priorities, and in particular the emphasis placed on accommodating the objectives of the West of England Local Enterprise Partnership’s (LEP) Strategic Economic Plan (SEP). The Strategic Objectives of the SEP should underpin the overall Strategy and Strategic Priorities.

Others

- Weakness: too much housing in unsustainable locations relative to employment hubs and housing delivery likely to be significantly lower than projected need.

Social priority

West of England Public Health Partnership

- Recommends that health and wellbeing is given greater emphasis in the strategy and suggests it would be appropriate to make explicit links to improving health outcomes and reducing inequality in health.

Development industry

- The Preferred Spatial Strategy and the locations identified do not address the needs of the Somer Valley i.e. the JSP does not benefit all sections of communities.

- Fundamentally this Plan is not seeking to close the gap between disadvantaged and other communities by not addressing the Full Objectively Assessed Need for housing.

Others

- Weakness: insufficient market and social housing.

- Developing in the M5/A38 corridor, Thornbury, Buckover and Charfield contradicts the “Social” strategic priority by creation of dormitory towns that tend to be disconnected with the community of the towns.
Bath Preservation Trust

- The restriction of ‘Strategic Priority 3: Environment’ to the natural world, excluding the high quality built environment of many towns and villages means that the Plan fails to encompass a whole section of the NPPF (Section 12).

Environment priority

West of England Nature Partnership

- The reduction of emissions (air pollution and Greenhouse Gases) should be addressed in the Strategic Priorities, for example by alluding to air quality and Greenhouse Gas emissions in the ‘Environment’ Priority and indicating that Infrastructure would be designed to support reductions in both.

CPRE Avonside

- Protecting landscape character and areas of high quality landscape is an important consideration that should be given greater emphasis in the Strategic Priorities.

Bristol Avon Catchment Partnership

- The emergence of the JSP may create potential conflicts with existing local plans and strategic views which may require mitigation. Need to ensure that the JSP considers the Bristol Avon Catchment Partnership Vision, enables the delivery of our goals, and ultimately the Water Framework Directive.

University of Bristol

- There has to be a thorough assessment of the environmental impacts of all the SDLs in order to be certain that the ‘Environment’ Strategic Priority is not fundamentally compromised.

Others

- Weakness: insufficient evidence on environmental priorities.

Infrastructure priority

Tortworth Parish Meeting

- Agrees infrastructure, particularly transport is key to delivery.
Others

- Weakness: relies too much on new transport infrastructure, raising questions of financial viability, and assumptions of modal shift to non-car travel, which raises questions of realism in dispersed locations. The potential for using and developing existing urban infrastructure appears not to have been tested, notwithstanding the wide recognition that successful public transport networks require a critical mass of population and higher population density.

OFFICER RESPONSE

There is a mixed view from stakeholders on what economic rebalancing is and how it should be addressed. There is a view that there should be more employment opportunities at a number of locations, and a counter view that the emphasis should be on reducing the need to travel by placing new housing close to existing employment opportunities.

The Emerging Spatial Strategy highlighted the need to consider how best to rebalance the economy of the sub-region with a focus at south Bristol and Weston and sought views form stakeholders. It is acknowledged that further clarity needs to be provided in the JSP on the approach to economic rebalancing. Further work will consider what local level employment provision may need to be accommodated through local plans.

KEY COMMENTS ON THE SPATIAL IMPLICATIONS OF THE STRATEGIC PRIORITIES

1. Economic rebalancing

Business West

- Insufficient weight is given to the sustainable transport implications of promoting economic growth generally in the Plan area.

Linden Homes Strategic Land

- Considers a balanced approach has not been taken in the Somer Valley, which should provide opportunities for growth to support local needs and to accommodate the economic growth objectives of the SEP.
OFFICER RESPONSE

There is a mixed view from stakeholders on what economic rebalancing is and how it should be addressed. There is a view that there should be more employment opportunities at a number of locations, and a counter view that the emphasis should be on reducing the need to travel by placing new housing close to existing employment opportunities.

The Emerging Spatial Strategy highlighted the need to consider how best to rebalance the economy of the sub-region with a focus at south Bristol and Weston and sought views from stakeholders. It is acknowledged that further clarity needs to be provided in the JSP on the approach to economic rebalancing. Further work will consider what local level employment provision may need to be accommodated through local plans.

2. Identify sufficient land

Bath Preservation Trust

- Would be helpful to clarify how the plan is to deal with (for example) the under-supply of affordable housing, leading to the promotion of urban or village extensions in areas not included in the plan.

CPRE Avonside

- The prioritisation on brownfield development would allow greater opportunity for investment in public transport to be funded or recouped through greater usage, as well as encouraging greater economic productivity.

Priston Parish Council

- Suggests that the most sustainable form of development is that concentrated close to the main areas of existing and future employment i.e. in the cities, particularly Bristol.

Environment Agency

- Utilisation of Brownfield sites is welcomed as it has the potential to enable the remediation of contaminated sites that would otherwise remain a risk to the environment.
OFFICER RESPONSE

Support for prioritisation of Brownfield land is noted.

All aspects of sustainability, including proximity to the existing centres were considered. The Emerging Spatial Strategy needs to balance different factors and be based upon reasonable and sound planning judgements.

3. Retain overall function of the Green Belt

Bristol Civic Society, Thornbury Town Council, Wraxall & Failand Parish Council

- The transport-focused approach and protection of the Green Belt are not compatible. There is a need to review the Green Belt to allow land swaps to enable development to be more balanced and better located.

Siston Parish Council

- Appreciates confirmation that the whole Bristol and Bath Green Belt will be retained in order to continue to serve its overall function.

Clevedon Town Council

- Support for a Green Belt review to be undertaken, especially in respect of assessing the potential for land at Ashton Vale and other sustainable areas to be released from the Green Belt for development.

Rangeworthy Parish Council

- Concerned the locations identified will eat into Green Belt land and the countryside generally.

Marshfield Parish Council

- The focus on Green Belt is not helpful. In many areas Green Belt can accommodate housing without detriment to the reasons for which it was imposed.
Taylor Wimpey

- The retention of the Green Belt does not reflect any element of the Vision or the Strategic Priorities from which the Spatial Implications are supposed to derive. Appears to be a contrived attempt to insert a reference to protection of the Green Belt, where logically it does not fit. For this reason, Spatial Implication 3 is not justified and should therefore be removed from the JSP.

OFFICER RESPONSE

Paragraph 84 of the NPPF requires plan-making to consider the implications of development directed towards or away from Green Belt. This is directly addressed in section 4 of the topic paper on The Formulation of the Emerging Spatial Strategy and the Emerging Spatial Strategy.

The wide-ranging views from stakeholders is strong evidence that there is no single or simple answer on how to accommodate the needs of the sub-region. The Government has recently indicated in the Housing White Paper the tests they intend to incorporate into national policy that will need to be applied when considering the appropriateness of using Green Belt land for development. The next stage of the JSP will need to take into account the implications of any national policy revisions alongside the results of the consultation in the preparation of the Regulation 19 Draft Plan.

4. Environmental quality

Environment Agency

- Careful consideration will need to be given to possible impacts on groundwater resources and to the legacy of past uses.

Natural England

- There are a number of strategic locations where it has not been demonstrated that “The environmental quality of the West of England is maintained and enhanced”.

Environment Agency

- Opportunities for biodiversity enhancement should be sought wherever possible, seeking to create and link up strategic green corridors throughout the strategy area.
Mendip Hills AONB Unit

- Not convinced how “the environmental quality of the West of England is maintained and enhanced”.

Wessex Water Services Ltd.

- The Strategy provides the opportunity to promote good urban design to enable environmental enhancement across the region, which should be incorporated into the policy decisions associated with each Strategic Location.

RESCUE: The British Archaeological Trust

- In the section headed ‘Spatial implications of the Strategic Priorities,’ amend Item 4, first Bullet Point to read:

  “The environmental quality of the West of England is maintained and enhanced by:

  Planning positively to ensure that development encourages and does not restrict the benefits the Natural and Historic Environments can provide.”

Gloucestershire County Council

- Agree with the spatial implications in respect of ensuring no net loss to Biodiversity and enhancing eco-system service provision. But, surprised that enhancement of the Natural Environment does not figure in the JSP Summary Document (Pages 22 & 23) or in the documents online: ‘Likely mitigations and infrastructure required to support the emerging Spatial Strategy’ and ‘Supporting infrastructure for urban living’.
OFFICER RESPONSE

The formulation of spatial strategy and how the evidence has been considered, is explained in the topic paper ‘The Formulation of the Emerging Spatial Strategy and the Emerging Spatial Strategy’. This includes the assessment of alternative locations and draws on the SA, which considers the social, economic and environmental objectives of the plan. The justification of each of the preferred locations is explained in some detail.

The identification of the strategic sites involved assessments of environmental and other constraints, so any potential ‘show stoppers’ (such as floodplain or sensitive ecological sites) have been avoided. However, it is important to consider the wider, cumulative impacts of the overall strategy. On the environmental priority there is an opportunity for greater partnership working to ensure the strategy helps to deliver shared priorities with our partners, including the Local Nature Partnership, Bristol Avon Catchment Partnership and the Public Health Partnership, in particular through work on place-making and green infrastructure.

The need to be more ambitious and clear on how the strategy can provide direction to help ensure the environment is maintained and enhanced is acknowledged. The aim for net gain as opposed to no net loss of environmental quality is noted as an aspiration. This will be reviewed in the next draft of the JSP.

5. Reducing the need to travel

Highways England

- Welcome measures which help to reduce the need to travel by private car and therefore unnecessary use of the Strategic Road Network (SRN). But have concerns that the spatial distribution of sites is not as sustainable as it might be and will not deliver these Priorities as well as they might if alternatives were taken forward.

- Generally content that the majority of development will be delivered through strategic development locations. Think that larger developments are more able to provide sustainable improvements and mitigation for any adverse impacts that they have. However, have concerns about the location of these developments and their impact on the SRN, particularly the M5.

- In a transport context, the Ashton Vale site (the Vale) is a good option for a significant amount of the identified development.
Locations should also be assessed on the basis of an appropriate Spatial Strategy that ties in with the Joint Transport Study. Appropriate risk assessments should be undertaken of funding for transport schemes proposed to support identified locations.

**Railfuture**

- Supports in principle the measures to encourage modal shift across the plan area, but consider the potential role of rail has been understated.

**Peasedown St John Parish Council**

- Focusing the locations along the main transport corridors makes logical sense.

**OFFICER RESPONSE**

Broad support for the principle of encouraging modal shift to more sustainable modes of transport is noted.

The scale of the Strategic Development Locations in helping leverage investment in necessary infrastructure to mitigate development is noted and will continue to be considered in the next draft of the JSP.

Concerns regarding the impact on the Strategic Road Network are noted and will be further explored with delivery partners.

The formulation of spatial strategy and how the evidence has been considered, is explained in the Topic Paper ‘The Formulation of the Emerging Spatial Strategy and the Emerging Spatial Strategy’. All aspects of sustainability including proximity to the existing centres were considered. The ESS sets out that the strategy needs to balance different factors and be based upon reasonable and sound planning judgements.

**COMMENTS ON THE SPATIAL STRATEGY**

**Sequential approach**

**Development industry including the Home Builders Federation Ltd (HBF)**

- This strategy will lead to unsustainable outcomes and needs to be reviewed to include an approach giving greater emphasis to locating new housing closer to where people will access employment, education and their shopping and leisure needs.
The overall sequential approach needs to give greater priority to accessible locations closer to the city of Bristol, which are more likely to promote sustainable access.

The spatial strategy should look favourably on sustainable sites located adjacent to the urban area, including sites within the Green Belt.

Current consultation continues to refer to prioritising brownfield land and a sequential approach to identifying strategic locations to meet development needs. This reference suggests a pre-determined attitude, rather than an open mindedness to consider all reasonable alternatives. The JSP should be encouraging the most efficient use of brownfield land in accordance with the NPPF, rather than prioritising. The meeting of housing needs in the WoE will require a combination of all four previously proposed options (urban intensification, urban expansion, town expansion and other locations). It is acknowledged that urban extensions are a sustainable way to deliver housing, however such locations alone will not meet the Objectively Assessed Housing Need in full, nor sustain rural communities, so development in other locations will also be needed.

Given the significant shortfalls in meeting full identified housing needs across the WoE, object to the Plan in its current form until full housing needs are planned for and additional sites are identified to meet these needs. In particular, whilst the pursuit of a range of options in the current Plan is supported, there are many omission sites which are very sustainable located near existing transport links, on the edge of the city and adjacent to other sustainable settlements, which would accord with the emerging spatial strategy. They would appropriately and positive contribute to meeting housing needs; and can provide additional investment to help the WoE deliver its ambitious transport strategy.

Other observations

There are ‘strategic priorities’, ‘spatial implications’, ‘an approach to building the spatial strategy’ and ‘implications for strategic development locations’ but there is no real description of what the spatial strategy is (University of Bristol).

Support for the four Strategic Strategies and the Sequential Approach to identifying locations for development laid out in the Study (Olveston Parish Council).
OFFICER RESPONSE

The formulation of spatial strategy, and how the evidence has been considered, is explained in the Topic Paper ‘The Formulation of the Emerging Spatial Strategy and the Emerging Spatial Strategy’. This includes the assessment of alternative locations and draws on the SA, which considers the social, economic and environmental objectives of the plan. The justification of each of the preferred locations is explained in some detail.

The observation that the narrative of the Spatial Strategy needs to be strengthened is noted.

Delivery of affordable housing is addressed at question 2 and further work on reviewing the evidence base to support the next draft of the JSP will include consideration of improving deliverability and viability.

SUSTAINABILITY APPRAISAL (SA)

Historic England

- The evidence base, as currently expressed in the draft SA, would benefit from greater detail to establish, with a greater degree of confidence, that the 10 proposed Strategic Locations are appropriate.

West of England Public Health Partnership

- Recommends developing the SA criteria to make more explicit links to health and wellbeing and making use of Joint Strategic Needs Assessment (JSNA) data in the SA process, through public health officer representation at the SA working group.

Business West

- The SA must look at all reasonable alternatives and options for meeting identified need. This must include identifying the best Spatial Locations for achieving sustainable development. This must include the Green Belt, which is not excluded anywhere in the NPPF or in wider Policy.

- The 2015 SA found that many locations where urban extensions could be considered scored positively on sustainability grounds in access to public transport, existing cycling and walking infrastructure and in closeness to public services, leisure facilities and employment centres and employment land.
• In contrast many of the locations currently put forward in the Plan, particularly those beyond the Green Belt, were found to score negatively within this SA due to their distance from public transport, in being disconnected from existing employment centres and public services for example. Other locations scored poorly because they were on high quality agricultural land.

• Locations should be assessed on the basis of a robust SA, which it appears has not yet been undertaken, to assess current proposed Spatial Locations for development.

OFFICER RESPONSE

The formulation of spatial strategy, and how the evidence has been considered, is explained in the Topic Paper ‘The Formulation of the Emerging Spatial Strategy and the Emerging Spatial Strategy’. This includes the assessment of alternative locations and draws on the SA which considers the social, economic and environmental objectives of the plan. The justification of each of the preferred locations is explained in some detail.

All aspects of sustainability including proximity to the existing centres were considered. The ESS sets out that the strategy needs to balance different factors and be based upon reasonable and sound planning judgements.

The Sustainability Appraisal for the next draft of the JSP will consider these detailed technical points raised in the consultation on this part of the evidence base.

GENERAL OBSERVATIONS ON THE STRATEGIC LOCATIONS

West of England Nature Partnership

• ‘Ecosystem Service Evidence to Inform the West of England Joint Spatial Plan’ should be used to help inform the size, scope and type of development, not only across the SDL sites, but also taking into consideration the wider landscape impacts. Due weight also needs to be given to the environmental, economic and social benefits that Green Infrastructure can deliver.

• In general, there is a need for further evidence of the impact the emerging Spatial Scenarios might have on Biodiversity and eco-system services. This would be required in order to ensure appropriate actions by way of mitigation.
West of England Public Health Partnership

- The approach to answering this question has been for each local Public Health lead to consider the SDLs in their respective area, in terms of the four strategic objectives and their links to the determinants of health.

Development industry including Taylor Wimpey

- A significant number of the strategic locations identified in the Plan are in areas poorly served by alternative modes to road traffic, notably M5/A38 corridor, Nailsea, Backwell, Whitchurch, Coalpit Heath, Yate, Charfield, Buckover and Thornbury. Without serious, sustained and properly funded attention being given to providing these areas with alternative choices to the car, these areas will inevitably experience further big increases in traffic levels, to the detriment of everyone who lives and works there.

- The derogation of ‘sustainability’ in favour of Green Belt protection in paragraph 36 of the Plan is out-with the approach in paragraph 84 of the NPPF; inconsistent with the Vision and Strategic Priorities of the JSP; contrary to Case Law on the Application of the Exceptional Circumstances Test; and is in the respondent’s view legally flawed as it fails to ensure that the JSP plans for sustainable development.

OFFICER RESPONSE

The identification of the strategic sites involved assessments of environmental and other constraints so any potential ‘show stoppers’ (such as floodplain or sensitive ecological sites) have been avoided. Joint working with the Local Nature Partnership has helped to inform the JSP evidence base. The Authorities will continue this joint working to ensure the Plan gives strategic direction on these issues, with our partners including the LNP, the Bristol Avon Catchment Partnership and the Public Health Partnership.

Further work is required to identify the detailed infrastructure requirements, including transport, community services and facilities and green infrastructure, and their funding, and how this can be provided in step with development. At several strategic development locations there is a need to more precisely define the location and capacity of new development areas and how this will relate to delivery. There will be consideration of the impact of infrastructure not being available at the right time, such as increased congestion and its impacts and the need for phasing. Need also to take into account the potential benefits of new development in supporting infrastructure delivery for the wider community.
COMMENTS ON STRATEGIC LOCATIONS (IDENTIFIED IN TABLE 1 OF THE EMERGING SPATIAL STRATEGY)

Key points raised in respect of the strategic locations, but only within the context of this question, are summarised below.

- The urban strategy proposed makes more sense than building on green field sites in villages. To ensure that new houses are within easy reach of employment opportunities they have to be built on the outskirts of Bristol and Weston-Super-Mare, even if that means sacrificing a small part of the Green Belt.

- Disappointing that the 12,000 units for Bristol are not broken down to identify more specific locations, as there is a significant difference between development in the central heart of the city and towards the fringes.

- Agree with the position that there are no opportunities to further ‘maximise the urban potential of Bath.’ The emphasis on maintaining the Green Belt around Bath, in order to protect the setting of the Bath World Heritage Site and prevent sprawl, and the separation of Bristol, Keynsham, Saltford and Bath is welcomed. (B&NES Liberal Democrats Group)

- Questions whether the M5/A38 corridor strategic growth location would encourage sustainable travel. Appears to be highly car dependant and contrary to the fifth of the “Spatial implications of the strategic priorities”, relating to sustainable travel. (Natural England)

- The rationale for inclusion of North and East Keynsham as a strategic location refers to up to 1,100 houses. Such an increase in housing numbers has the potential to adversely impact views into and out of the AONB. Careful consideration needs to be given on how a development of this size would impact on the setting of the Cotswolds Area of Outstanding Natural Beauty. (Cotswolds Conservation Board)

- Consider it essential that sufficient housing and employment land is provided in Bath to support and benefit from the Universities activities. Only then will the Plan’s spatial strategy meet its own strategic priorities and vision, notably in terms of supporting and facilitating economic growth and aligning jobs and homes. (University of Bath, Define Planning and Design Ltd)

- Avonmouth has been identified as a Strategic Employment Location, but this fails to take account of transport links/access issues to and from the M5. (Portishead Town Council)
OFFICER RESPONSE

Support for prioritising Brownfield land is noted.

The approach to identifying the Urban living component of the spatial strategy is detailed in the Topic Paper ‘The Formulation of the Emerging Spatial Strategy and the Emerging Spatial Strategy’.

The need to ensure a balance between homes and jobs is noted.

Further work is required to identify the detailed infrastructure requirements, particularly transport, their funding and how this can be provided in step with development.

NON-STRATEGIC GROWTH

The JSP needs to adopt a flexible approach in terms of site options, also taking into consideration the significant contributions non-strategic developments could have in meeting local needs. (Development industry)

LOCATIONS CONSIDERED AND NOT PUT FORWARD IN THE EMERGING SPATIAL STRATEGY (IDENTIFIED IN TABLE 2 OF THE ESS)

Support for the exclusion of the following sites as Strategic Locations:

- Clutton and Temple Cloud (Cameley Parish Council)
- Bridge Yate/Oldland Common and West of Twerton, Bath (Cotswolds Conservation Board)
- Somer Valley (Mendip District Council)
- Winterbourne
- Easton in Gordano/Pill
- Hicks Gate
Support for the reassessment and potential reinstatement of the following sites as reasonable alternatives:

- Ashton Vale especially as a suitable alternative to the Mendip Vale proposal (M5-A38 corridor)
- West and South West Keynsham and Hicks Gate
- Easton-in-Gordano/Pill
- Severnside
- Portishead
- Clevedon
- Pucklechurch and M4 to Shortwood
- Somer Valley
- Long Ashton.

**OFFICER RESPONSE**

The views expressed are noted and will inform the next stage of the draft JSP.
Are there any reasons why this strategy or identified locations could not be delivered?

OVERVIEW

Approximately 1,400 respondents answered this question. Not all respondents gave a direct yes or no answer but of those that did 600 said there were reasons the strategy could or should not be delivered. Around 20 respondents said that it could be delivered (two thirds of these responses were from the general public). Respondents who answered this question included:

- Individual members of the public - 1231 (88% of those who responded)
- Interest groups (including resident action groups, CPRE, National Trust, wildlife and environment trusts, local political parties) - 41
- Development industry (including housing associations, landowners and developers) - 47
- Local government - 9
- Parish councils - 48
- Business community (including Bristol Port Company, Visit Bath, Horizon Nuclear Power) - 7
- Additional organisations (including the Ministry Of Defence, NHS Trusts, water and drainage companies, Historic England and Natural England) - 11

The most common reasons given for the strategy being considered undeliverable were:

- The resulting pressure on transport infrastructure and that the infrastructure to mitigate the growth was undeliverable (mentioned 990 times).
- Pressure on other infrastructure (mentioned 737 times).
- It is an unsustainable strategy (348)
- Green Belt constraints as well as flooding and pressure on the environment. Landscape and heritage was mentioned over 100 times, and comments on the detrimental effect on the character of existing settlements.
Many respondents raised concerns to particular strategic locations. The most objections were raised in relation to:

- SE Bristol and Whitchurch location (328)
- Nailsea/Backwell (216)
- Charfield (160)
- M5 to A38 corridor (114)
- The fewest concerns were related to the Weston, Bath, North and East Fringe and Bristol urban living locations (4, 6, 9 and 12 respectively).
- The most transport concerns were raised in relation to the SE Bristol Whitchurch location (92% of respondents on this location raised transport concerns), Charfield (87%), Nailsea/Backwell (70%). Furthermore, 144 respondents raised general concerns about transport.

Other general issues raised included that:

- The strategy may not be deliverable as it is based on an unreliable jobs forecast
- The locations do not reflect a commitment to sustainable development (Banwell/Churchill A38/M5 corridor)
- Increased use should be made of brownfield land.

**OFFICER RESPONSE**

Question 5 is about delivery. The primary issue raised is in relation to the delivery of necessary infrastructure, including transport infrastructure.

Given the strategic nature of the plan, the level of detail required at this stage must be proportionate. For some of the strategic locations there is a great deal of information about delivery; for others, further work is required.

The evidence base needs to be clear as to what essential strategic infrastructure will be required and how and when it will be delivered in step with new development. This is being undertaken through the Joint Transport Study and other infrastructure studies, including green infrastructure and work with delivery partners including utilities, which will be used to inform the viability work. There is a need for more consistency in relation to the level of detail identified for specific sites and this will be brought forward as part of the evidence base to support the next stage of the JSP.
GENERAL COMMENTS

Environment Agency:

The Environment Agency generally advised that flood zones 2 and 3 should be avoided and commented on the individual locations with respect to flood risk and the need to work closely with the Unitary Authorities to ensure any flood mitigation strategies are in place.

Once strategic development locations have been agreed, relevant studies should be undertaken to assess the impact of new sites in combination with already approved sites. This may demonstrate an increased need for strategic surface water attenuation/flood storage and any ground water source protection issues. Advice was given on surface water drainage and the need for any development to provide funding for flood defence measures as appropriate. The importance of strategic flood risk management infrastructure was emphasised. Advice is given in relation to each of the strategic locations however, no outright objection was made to any of them.

Bristol Avon Catchment Partnership:

The Partnership promote a catchment based approach for water management with a green and blue infrastructure strategy at the core and advise that a Catchment Adaptation and Resilience Plan is prepared. Emphasis is given on the holistic scale approach to be taken to flood defence assets/strategic surface water attenuation works required. No specific comments are made in relation to individual locations.

Wessex Water:

Further work is required to identify the environmental, drainage and flooding implications of each location, and policies to address this at a more holistic scale should be identified. Comments are offered on each location on water status, flood and resilience, sewerage supply and issues affecting the wider catchment. Key issues included:

- Nailsea / Backwell flood management issues and development should address surface water drainage quality and quantity issues.
- M5 to A38 transport corridor - details of timing and location essential to inform planned work.
- Thornbury - high value of agricultural land not recognised, drainage strategy essential, erosion risk.
- Charfield - erosion risk, welcome maximised opportunities for sustainable transport
- Buckover - drainage strategy needed, erosion prevention, high value of agricultural land not recognised.
• SE Bristol, Whitchurch-downstream effects need mitigation, Sewerage Treatment Works expansion needed.

• Yate strategic corridor- increased pressure from flooding downstream

• North and East Keynsham - water treatment improvements needed,

• Coalpit Heath - increased pressure on flood risk management downstream, high value of agricultural land not recognised.

A separate representation highlights a disconnect between the JSP strategic locations and the sustainability appraisal, suggesting that land at Claverham Down should be released from the green belt for up to 200 houses.

**Natural England:**

Have attempted to group Strategic Development Locations into categories of concern, as set out below. Evidence is needed that no significant environmental constraints exist at the strategic locations before moving forward. These include:

• Impact on the Cotswold and Mendip AONB (Bath, Charfield and A38/M5 corridor and potentially Yate/Chipping Sodbury, Keynsham)

• Impact on SSSI (west of Nailsea and Charfield, Yate/Chipping Sodbury)

• Impact on the bat SAC foraging area (west of Nailsea/Backwell) and disturbance to Ochre caves (A38/M5 corridor), the riverside area of Keynsham is also sensitive

• Landscape character Whitchurch

• Potential for Great Crested newts across all locations

Generally the JSP needs to factor in the need for an HRA, maintaining levels of access to green infrastructure and addressing deficits, cumulative impacts and effect on SNCIs.

**Highways England:**

Concern that it will be challenging to make some of the Strategic Site Locations sustainable, specifically sites at Banwell, Churchill, Backwell, Charfield and Buckover and suggest that their identification should be revisited to identify sites which would have less adverse impact i.e. Ashton Vale, or to make sites on the north of the WoE area significantly bigger.
Local residents/community groups:

Almost without exception the comments from individuals and community groups relating to individual strategic locations were of objection, the most common grounds being on lack of transport and other infrastructure and unproven deliverability of the transport mitigation measures put forward. The need for transport and other infrastructure to be implemented in advance of development was emphasised.

Other additional reasons varied with location, for example at Coalpit Heath there were concerns about previous mining activities and on the impact on the Dramway as well as flooding, in relation to the A39-M5 transport corridor there was also concern about flooding, in Charfield economic constraints and the effect on the character of existing communities were commonly mentioned. At Nailsea/Backwell the most common other reasons mentioned were lack of employment opportunities and an adverse effect on the character of existing village and town.

Town and Parish Councils:

The Town and Parish Councils of affected parishes raised objections to the proposals.

A number who were not immediately affected by the suggested locations and who had responded to other questions had:

- No view on the feasibility of the locations put forward
- Support for the strategy but emphasised the need for transport enhancements to be delivered.

Developers/landowners:

A number of respondents put forward specific reasons why one or more sites could not be realised and many of these dwelt on the deliverability of the necessary transport infrastructure. Others remarked that the evidence for the strategy was flawed and relied on an inadequate assessment of the weight which should be given to the positive benefits of releasing Green Belt land. The main issues raised were:

- The strategy is flawed in that it ignores the availability of more sustainable sites on the edge of Bristol which are within the green belt.
- The need for a robust assessment of Green Belt land in accordance with the good performance of Green Belt sites in the SA and suitability of land for release. Better Green Belt sites are available than the Strategic Development Location shown in the JSP.
- A stage 3 Green Belt assessment is needed to identify smaller pockets of land which could be potentially developed for non-strategic sites.
- Questions were raised over maximising the potential of urban living locations.

- A greater geographical refinement is needed to allow more clarity over exactly where the strategic sites are located in relation to existing settlements.

- The JSP should specifically allocate sites.

- There is a disconnect between the strategic locations and the sustainability appraisal.

- Questions relating to the deliverability of and funding for the necessary transport infrastructure.

- Over reliance on major strategic sites.

- Lengthy and often delayed lead in times are associated with new settlements which therefore requires additional locations to be brought forward for the short to medium term.

- Greater flexibility in sites is suggested to ensure a five year housing land supply is maintained.

- Further justification is required for the A38/M5 corridor location.

- A timely delivery of infrastructure is crucial, but is likely to cause delays in delivering sites.

- Markets are largely untested in the majority of the strategic locations.

- Slow delivery rates across South Gloucestershire are predominantly because of the lack of availability of sites rather than a lack of demand. A greater emphasis should be put on allocating sites across the North and East Fringes to remedy this.

- No need for additional strategic development land near Weston-super-Mare.

**Site promotion:**

A number of locations were proposed for development as alternatives to those strategic locations under Question 5 however, this does not necessarily include sites put forward in response to other JSP questions and therefore this is not a complete list. They included the following:

**Promotion of sites within the strategic locations identified in the JSP**

A number of respondents put forward proposals for development within the strategic locations as follows:

- South Charfield (Charfield Landowners Consortium +CEG)
• Hill House Farm Charfield (Baker and Day)

• Charfield north (250 Bloor Homes)

• Whitchurch west of A37- 2,000 homes to the west of the A37. Could deliver significant transport improvements and avoid impact on heritage assets. Deliverable in the shorter term (Taylor Wimpey, Bovis Homes + Land Improvement Holdings)

• Coalpit Heath and Yate (Edward Ware Homes)

• Keynsham (Edward Ware Homes)

• South Nailsea performs better in SA than land to the west (Gleeson)

• North East Nailsea for 600 homes within Green Belt (Nailsea Holdings LVA LLP)

• Tortworth Estates for Buckover Garden Village

• Grove Farm Backwell (Taylor Wimpey)

• Thornbury, Crossways (Newland Homes)

Sites outside strategic locations identified in the JSP

A number of sites were put forward as alternative strategic development locations including:

• Failand (Boyer Planning)

• Almonsbury (Edward Ware Homes)

• Ashton Vale (Taylor Wmpey)

• Long Ashton (Long Ashton Land Co)

• North east Nailsea (Nailsea Holdings LVA LLP)

• Bristol Road, Hambrook (Redrow Homes)

• Pucklechurch (IM Properties PLC)

• Hicks Gate (Crest Strategic Projects + Key Properties)
Non-strategic sites

A number of non-strategic sites were also promoted. These will be considered as part of the analysis of the information received following the supporting ‘call for sites’ exercise.

OFFICER RESPONSE

The identification of the strategic locations involved assessments of environmental and other constraints so any potential ‘show stoppers’ (such as floodplain or sensitive ecological sites) have been avoided. However, it is important to consider the wider, cumulative impacts of the overall strategy in terms of delivery. Many responses draw attention to locally sensitive issues which will need to be addressed at the detailed level, but it is difficult to appreciate the implications for delivery at this stage.

The evidence base needs to ensure that, in relation to delivery, the cumulative impacts are taken into account such as water management, and the impact on sensitive sites. The implications for delivery will need to be reviewed as more detailed work is undertaken in respect of the strategic sites.

Many respondents raised issues relating to transport infrastructure, along with investment to address environmental impact and resilience and their funding and delivery.

Some development industry responses raised issues about the balance of long-term strategic locations smaller easier to deliver sites which weren’t reliant on expensive infrastructure. This would provide more delivery in the shorter term. Alternative locations are identified as being more deliverable for a variety of reasons.

The JSP needs to reassess the overall mix and balance of sites to from a delivery perspective to ensure that the plan objectives are met and that housing, jobs and infrastructure are delivered in a timely way to address needs and plan objectives.

RESPONSES TO STRATEGIC LOCATIONS

Urban living

Although a common thread in objections to development at strategic locations included the need to make more effective use of brownfield land. This was not reflected in support for the urban living locations as outlined below.
Bristol Urban living location

Of the twelve respondents who raised concerns over the Bristol urban living location, there was a wide spread of reasons including pressure on transport infrastructure, flooding and the effect on the environment being the most common reasons with landscape and economy also mentioned. Two respondents thought there had been insufficient explanation of the locations. Amongst other issues raised by developers are that insufficient evidence has been put forward that the required capacity exists.

Bath urban living location

Of the small number of respondents (6) who raised concerns over the Bath Urban living location there was a wide spread of reasons, with no overall consensus although four respondents raised concerns about the effect on the environment.

Weston urban living location

Of the four objections to the Weston urban living location, flooding and the effect on the environment were the most common reason given.

Communities of the Bristol North and East Fringe urban living location

Of the nine responses received, pressure on transport infrastructure was the most common response, followed by pressure on infrastructure, flooding and green belt constraints.

OFFICER RESPONSE

Although there were relatively few comments made in respect of delivery within the urban areas, the JSP acknowledges that delivery on many of these brownfield sites is challenging. However, this growth will be delivered at the detailed plan level on smaller non-strategic sites with a variety issues and constraints.

There is a need to further develop the evidence base to support the delivery of the urban living component and understand viability to ensure balanced sustainable communities can be delivered.
STRATEGIC DEVELOPMENT LOCATIONS OUTSIDE THE GREEN BELT WITH PROXIMITY TO OR WELL RELATED IN SUSTAINABLE TRANSPORT TERMS TO URBAN CENTRES

Nailsea/ Backwell:

From the 216 responses, the most concern raised was pressure on transport infrastructure and doubts about deliverability of the proposed transport mitigations. This was reflected in comments from both the development industry and individuals as well as other groups. Pressure on other infrastructure such as doctors, dentists, schools, and other facilities was a concern, as well as the effect on the character of existing communities.

The lack of local employment opportunities was raised, with the concern that the out-commuting of future residents to Bristol for work would increase traffic congestion to higher levels. The level of development proposed for Backwell was considered to be out of proportion to the size of the village. Environmental and landscape constraints and lack of sustainability was also raised.

Other issues included:

- Lack of appreciation of residents views raised in the Backwell Neighbourhood Plan;
- Inappropriateness of combining Backwell and Nailsea;
- Lack of capacity in town centre car parks (Nailsea).
- Questioning the constraints in alternative locations.
- Insufficient analysis to demonstrate deliverability or funding availability.
- Loss of good agricultural land.
- The impact already in airport traffic and planes on Backwell.
- Would prejudice the important green corridor between Nailsea and Backwell.
- Support growth at Nailsea, but land to the south of the town provides a more sustainable location (Gleeson).

M5 to A38 transport corridor

From the 114 respondents who raised concerns over the proposed strategic growth along the M5 and A38 transport corridor, large numbers related to pressure on transport infrastructure, as well as other infrastructure and flooding. Other issues raised to a lesser extent were economic, environmental and landscape constraints.
Additional concerns included:

- Inability to deliver because of multiple land ownerships and neither developers or planners own the land,
- No realistic financial provision for transport and other infrastructure needs.
- Threat of coalescence with Banwell, Churchill and Sandford,
- The impact on the Mendip Hills AONB.
- Lack of deliverability will result in piecemeal applications on other sites here.
- Should assess likely resulting growth at airport and the impact on the environment.
- Transport mitigations are too focussed on the private car.
- Further justification for this strategic location is needed.

Other town expansion/new settlements

**Thornbury:**

The greatest concerns included the pressure on transport infrastructure (raised 45 times) and on other infrastructure and services (mentioned 34 times). There was an even but much lower level of concern raised over threat to the green belt, likelihood of flooding, environmental and economic constraints and the unsustainability of this option. The adverse impact of development on the existing character of Thornbury was also raised.

Additional concerns included:

- Alternative non green belt sites should be delivered (Newland Homes) with an alternative site at Thornbury put forward.
- The need for homes for the elderly and retired.
- Residents would not use Thornbury town centre as it would be too remote to walk, with little parking and would therefore do nothing to rejuvenate the town centre.
- The impact of the new road to Oldbury Power Station should be assessed.

Positive comments surrounding the possibility of creating a new town centre and that the level of growth planned for Thornbury should be increased, since there is potential to support improvements to infrastructure, services and facilities for the town (Linden Homes).
Charfield:

The greatest concerns from respondents included the impact on transport and other infrastructure including broadband. In particular the emerging neighbourhood plan was cited as not demonstrating a need for the level of growth proposed. Respondents raised the issue that there would inevitably be high levels of out-commuting particularly with a higher than average working age population, with doubts about the deliverability of the train station. Comments over why Charfield should be judged any more sustainable than Wickwar and question Tier 2 status as well as pressures on existing services at Wotton and query over cross boundary working. Furthermore, flooding, lack of employment and environmental constraints were also expressed along with general concerns about the sustainability of the proposals.

Additional concerns included:

- The location is not appropriately justified, or consistent with national policy (para 182 of NPPF).
- The high infrastructure demands may result in other areas being neglected due to lack of funds.
- The location contradicts the SA which states that “more remote locations are very unlikely to be suitable or attractive commercial locations”.

There was developer support for strategic growth at Charfield, but additionally there was concerns that there shouldn’t be an infrastructure requirement imposed as development is capable of going ahead without this.

Buckover Garden Village:

From the 72 comments relating to the Buckover location, pressure on transport infrastructure namely congestion on the A38, was the most common reason given for objecting to the proposals (mentioned 45 times) and then pressure on other infrastructure and services being second. Flooding, impact on the environment and heritage were also mentioned, along with the adverse impact on the character of surrounding communities.

Additional concerns included the lack of deliverability of the necessary transport infrastructure, with the resultant impact on 5 year land supply.

The land owners of Tortworth Estate within the Buckover strategic location support the proposal and endorse their commitment to assisting the necessary growth, including delivery of the necessary transport infrastructure and additional services and facilities.
LOCATIONS WITHIN OR PARTIALLY WITHIN THE GREEN BELT

South East Bristol Whitchurch:

This location generated the greatest number of responses (328). The effect on or lack of adequate transport infrastructure particularly the impact on and resulting congestion on the A37 and the undemonstrated deliverability of the necessary new transport infrastructure, were the most popular comments from respondents. The lack of sustainability of the site was emphasised, as was the unacceptable impact on the green belt. The risk to heritage assets (Maes Knoll and Queen Charlton Conservation Area) was mentioned, along with existing flooding. Furthermore, the argument that brownfield land should be used instead.

There was some support for the general strategic location from developers, but land west of the A37 should be considered instead as it is not dependent on the same transport infrastructure requirements and is also largely in the control of developers (Taylor Wimpey, Bovis Homes, Land Improvement Holdings).

Yate strategic corridor:

Of the 29 responses to this location around two thirds raised pressure on transport infrastructure as a key concern with the next issue being the inadequacy of existing services and facilities to cope with the additional population. A higher proportion than other locations mentioned issues around phasing of development, with around a third citing flooding and environmental impacts as constraints on development here.

Other considerations included:

- Developers not delivering on planning consents.
- Planning should concentrate on improving the environment for existing communities, not worsening it.
- Development won't be realised due to there being existing high growth here and optimistic building rates.
- The rate of change is too high for communities to absorb.
- The need for space between Bristol and Yate.

Support for this location came from a developer who confirmed the availability of land within the strategic location (Edward Ware Homes).
North and East Keynsham:

Of the 29 responses made directly about the north and east Keynsham location, there was less consensus on the reasons than other locations, with the most (8) relating to pressure on transport infrastructure and the same number citing opposition on green belt grounds. Environmental constraints and pressure on services and other infrastructure were raised a smaller number of times.

Other issues include an objection to the Saltford bypass.

There was support from a developer for land to the north of the railway which they are promoting, but that clarity is needed on whether the Saltford Bypass is needed as mitigation for this development. (Edward Ware Homes)

Coalpit Heath

This location generated 84 responses. The majority of concerns were focussed on the pressure on transport infrastructure and on the existing services and facilities. Concerns over the ability of Coalpit Heath to absorb the proposed levels of development without considerable damage to quality of life were represented. Almost equal to this however was the concern over environmental constraints and in large part due to the concern over the stability of the land and the existence of old mine shafts in the area. Many concerns were also raised over the potential impact on local heritage and the Dramway in particular. Issues on flooding and the impact on the landscape were raised as well as the impact on the Green Belt.

OFFICER RESPONSE

Further work is required to identify the detailed infrastructure requirements, including transport, and their funding, and how this can be provided in step with development. At several strategic development locations there is a need to more precisely define the location and capacity of new development areas and how this will relate to delivery. It is recognised that most respondents considered the impact of infrastructure not being available at the right time, increased congestion and its impacts and the need for phasing are critical issues. It also recognised that there is a need also to take into account the potential benefits of new development in supporting infrastructure delivery for the wider community. These issues will be fully considered as part of preparing the next stage of the JSP.

Comments on non-strategic locations

A number of respondents made comments on the amount of development to be considered at non-strategic locations and suggestions to sites for non-strategic growth including the following:
- The figure for non-strategic sites is too low and will limit opportunities for smaller developers and self-builders as well as failing to support rural communities, services and need for affordable homes. Deliverability will be improved if a larger number of non-strategic sites is identified (NSCLP Simon Jenkins, Edward Ware Homes).

- Objection to any development at Hicks Gate and land adjacent: Woodgrove Road Henbury, Westfield and Yatton.

- Developer criticism of potential of green belt sites to deliver non-strategic growth and promotion of other sites for non-strategic growth outside the locational strategy.

**OFFICER RESPONSE**

Several developer responses suggested the need for a higher proportion of smaller or non-strategic locations. These would tend to be smaller sites which could come forward more quickly and could provide opportunities for smaller developers.

The JSP needs to reassess the overall mix and balance of sites to from a delivery perspective to ensure that the plan objectives are met and that housing, jobs and infrastructure are delivered in a timely way to address needs and plan objectives.
Is the Preferred Spatial Strategy the most appropriate strategy, when considered against the reasonable alternatives?

OVERVIEW

Over 800 respondents answered this question, around 75 of whom generally agreed that the Preferred Spatial Strategy was the most appropriate, albeit some with reservations. Those who agreed with the strategy were representative of the following stakeholder groups:

- Local residents (75%)
- Environment Agency
- Mendip District Council
- Parish /Town Councils (under 10)
- Developers (under 5)
- Housing association (Solon)
- One local interest group

Over half the respondents felt that the Preferred Spatial Strategy as presented was not the most appropriate strategy or had considered reservations about the strategy. This group of stakeholders included:

- Local residents (90% of those who responded)
- Highways England
- Railfuture
- North Bristol NHS Trust
- Business community (Business West, Rolls Royce)
- Bristol University
- Urban design consultancy
- Parish/Town Councils (under 15)
- Yate & Sodbury Liberal Democrats
- Developers/those with land interests under (20)
- 6 local environmental interest groups (around 5)
- Action groups and one residents association (under 5)

Around 16% of respondents were either unsure what was meant by this question or what reasonable alternatives had been put forward for comparison with the Preferred Spatial Strategy. This included those who were unclear what alternatives had been considered in relation to individual locations rather than the strategy as a whole.
OFFICER RESPONSE

Support for the spatial strategy is noted.

The formulation of spatial strategy, and how the evidence has been considered, is explained in the Topic Paper ‘The Formulation of the Emerging Spatial Strategy and the Emerging Spatial Strategy’. This includes the assessment of alternative options and draws on the Sustainability Appraisal. The justification of the preferred locations is explained in some detail. The locations also considered but not included are listed in Table 2 to the ESS with a short commentary for each.

However, the results of the consultation will enable the UAs to review the strategy and the evidence and make any necessary adjustments that are considered necessary in the preparation of the Regulation 19 Draft Plan.

CHALLENGING THE HOUSING REQUIREMENT

Developers

- The housing requirement needs to be revised to reflect the full Objectively Assessed Needs (OAN) which is circa 150,000 dwellings according to experts such as Professor Glen Bramley and through the work completed by Barton Willmore (Hall and Woodhouse, Waddeton Park Ltd).

- The lack of robust evidence to justify the M5/A38 corridor and Bristol Urban Living options also calls into question the JSP’s ability to deliver the full housing needs of the area (Gladman Developments Ltd).

- The Emerging Spatial Strategy fails to plan for sufficient housing to meet the OAN. Additional sites will need to be identified to meet the true OAN. Whilst the majority of these will need to be strategic sites and thus identified through the JSP. The importance of non-strategic sites (of less than 500 homes) in meeting this requirement should not be underplayed (IM Land).
OFFICER RESPONSE

The Emerging Spatial Strategy seeks to fully meet the Housing Target which is based on the ORS SHMAs for the Bristol and the Bath Housing Market Areas. The preparation of these SHMAs is in accordance with national planning policy and has been successfully tested at examination in other areas. This produces the Housing Requirement of 105,000 dwellings to be delivered between 2016 and 2036.

The alternative SHMAs will be considered in the formulation of the Regulation 19 Draft Plan.

Further Govt releases on population and household data later this year might have implications for the OAN but the timing of these releases with determine whether these can inform the preparation of the draft plan.

Alternative Development locations are dealt with below but further work on the deliverability of the strategic locations is being undertaken as part of the formulation of the Regulation 19 draft JSP.

The importance of the non-strategic housing contribution is noted.

CRITIQUE OF THE PREFERRED STRATEGY

Local resident/community groups

- Perception that the West of England (WoE) authorities consciously chose at the outset not to identify and test alternative strategies.
- Focus on brownfield sites before Green Belt land.
- Transport issues including impact on existing congestion and the adequacy of transport links.
- The strategy is unsound and unsustainable because it creates a disconnect between the locations where job growth is predicted and the areas where the housing expansion will take place (Falfield Action Group and others).
- A number of the respondents used this question as a further opportunity to reiterate their concerns expressed under previous questions about the proposed strategic locations, in particular:
  - The perceived coalescence of Yate and Coalpit Heath.
The unsuitability of many of the non-Urban Living locations either as development locations or to accommodate the level of development proposed, most notably: Whitchurch Village, Charfield, Coalpit Heath, Thornbury, Nailsea and Backwell, M5-A38 Corridor (aka Mendip Vale) and Buckover.

Natural England

Premature to conclude this is the preferred strategy on the basis of the evidence available at present in terms of the natural environment. For many of these locations the evidence may well support the strategy, but for the locations of Nailsea/Backwell and M5 to A38 corridor, this may not be the case.

Railfuture

Some of the locations rejected and listed in Table 2 of the Emerging Spatial Strategy would seem to be relatively easy to serve by public transport e.g. Wickwar with its proximity to Yate station and that proposed at Charfield. The strategy needs to follow the Transport Vision in trying to move away from car dependency and to make the most of new train services like the Portishead line.

West of England Public Health Partnership

In assessing each of the identified strategic locations by local authority area, public health leads considered whether discounted locations may be preferable on public health and wellbeing grounds. None of the officers recommended that locations were inappropriately discounted through the planning process.

Business West

Need to reassess its planned Strategic Development Locations on a sequential basis, prioritising urban intensification first. Then, predominantly influenced by the findings of its Joint Transport Study combined with a new and thorough Sustainability Assessment, prioritising sustainable transport, the availability of transport nodes and public transport and the reduction of car use, long distance commuting and carbon emissions. These criteria should be prioritised as key objectives when a new Green Belt review is conducted.
West of England Nature Partnership

- There appears to have been no attempt to demonstrate that this is the preferred strategy. It would have been useful to see how the different alternatives have been assessed against, for example, the Strategic Priorities outlined in the JSP given the absence of a clear assessment of the merits of the alternatives in the Sustainability Appraisal. In assessing the ‘Likely mitigations and infrastructure required to support the emerging Spatial Strategy,’ mention of additional Green Infrastructure requirements should be included here alongside transport and other infrastructure. Also need to include Policy hooks in the JSP for the adoption of a Natural Capital Trust (NCT) in the Region.

South Gloucestershire and Yate Sodbury Liberal Democrats Groups/Yate Town Council

- Explained that locating development to the south west of Bristol would help to reduce the economic imbalances within the WoE and be more sustainable due to better transport links and proximity to the city centre employment areas and the Airport.

South Bristol Business

- Considers that the strategy is too weak on Bristol.

Federation of Small Businesses

- Suggestions for improving the Spatial Strategy:
  - Joint Authorities to complete an economic growth study based upon where growth will occur.
  - Prepare a raft of policies that encourage the formation and growth of small business across the WoE, in both urban and rural areas.
  - Spatial and transport strategies should be based upon evidence of where jobs will be created, 85% of which will be in small businesses.

Developers/landowners

General support for the broad approach set out within the topic Paper ‘Formulation of Emerging Spatial Strategy’ to direct growth to the most sustainable locations is. However, key points included:

- Consider the strategy is not based upon a robust assessment of sustainable locations and is not seeking to redress the balance of strategic housing locations and employment (A. T. Bennett & Sons).
• The JSP should set out the most appropriate spatial strategy and strategic locations to meet development needs as well as identify the transport and other infrastructure needed to support sustainable development although as yet it does not demonstrate how this has been achieved (Mead Realisations Ltd).

• Existing smaller towns and settlements may struggle if there is too much focus on larger urban areas and/or the creation of new settlements (Welbeck Strategic Land and Landform Estates).

• Associated risks with an over reliance on brownfield sites which are a finite resource. The artificial constraint of housing on Greenfield sites will not ensure delivery of unviable brownfield sites nor will it assist with the delivery of affordable housing (Mead Realisations Ltd).

• Request that the Joint Spatial Plan and Joint Transport Plan are reviewed to assess their impact (positive or negative) on the urban and rural disadvantaged communities here, and that the four local authorities should seek to give disproportionate benefit to those who need it most (Quartet Community Foundation).

• A heavy reliance on large scale growth areas requiring substantial up front infrastructure and its impact on the deliverability of both market and Affordable Housing (Bovis Homes Limited).

• A Sequential Approach to directing growth should be adopted to ensure that existing settlements with high levels of local infrastructure are prioritised (Bovis Homes Limited).

Parish and Town Councils

Key concerns and observations included:

• Query what the reasonable alternatives are (Wrington Parish Council, Midsomer Norton Town Council, Saltford Parish Council).

• Favour a sustainable approach which is ‘Transport Focussed’ (Wraxall and Failand Parish Council).

• Preferred Spatial Strategy to be refined to increase its credibility and allay local concerns (Iron Acton Parish Council).

• Implementation is key (Backwell Parish Council, Nailsea Town Council).

• Some Green Belt locations around Bristol that have been dismissed may require further consideration if there is difficulty meeting housing needs (Burrington Parish Council, Peasedown St John Parish Council).
• Support for Urban Extensions around the edge of the Bristol once Brownfield Sites are exhausted (Yatton Parish Council).

• Build as close to Bristol as possible to reduce the need for expensive road improvements for transport and give access to employment (Cleeve Parish Council).

• Support for reviewing the Green Belt to allow for sustainable development closer to Bristol’s edges, to the south of Bristol and around Bath to allow for housing that is more sustainably located in relation to employment and transport connections (Thornbury Town Council).

• The strategy of concentrating large developments in relatively few locations in South Gloucestershire will perpetuate the problem of slow delivery already experienced with the Core Strategy allocations (Yate Town Council).

• Inadequate existing infrastructure needs addressing (Rangeworthy Parish Council).

• Locating 5,400 homes around Banwell and Churchill will be proven to be unsustainable and undeliverable within the Plan period (Clevedon Town Council).

• The Plan should be structured as a series of 4 x 5 year plans rather than one of 20 years (Flax Bourton Parish Council).

OFFICER RESPONSE

The formulation of the Emerging Spatial Strategy is described in the background paper which supports the Emerging Spatial Strategy. This paper documents the locations considered, the rationale for the selection of the locations included, how these meet the plans priorities and the locations also considered but not included (which are also listed in table 2 of the ESS document). The paper, along with the other Topic Papers, explains how the supporting evidence has been considered and how this has influence the formation of the Emerging Spatial Strategy.

The focus on brownfield locations accords with the NPPF and is explained more fully in the Urban Living Topic Paper. The Strategic Development locations have been assessed in a consistent way across the West of England area and in accordance with National Policy as set out in the topic paper Assessment of Strategic Development Locations Beyond Settlement Boundaries Location Dashboards.

The comments received on the JSP and the alternative proposals will be considered as part of the preparation of the Regulation 19 Draft JSP. This will include reviewing the evidence base and assessing the implications for the planning framework.
ALTERNATIVE STRATEGIES

Particular support for the following rejected locations in Table 2 to be reconsidered to provide better alternatives than those locations identified in Table 1:

- Yatton, Long Ashton, Portishead, Clevedon West, South West Keynsham, Ashton Vale, Hicks Gate with Ashton Vale gaining the most support (around 100 respondents).

Other suggestions include:

- Focus on locations to the South and South east of Bristol with better transport links and shorter travelling times to work places which could be located in central brownfield sites.

- Reinforce the emphasis placed upon sustainability within the Vision and Spatial Priorities and not to dilute this in favour of a strategy which attaches greater importance to the preservation of the existing Green Belt boundaries.

- Investigate whether Filton aerodrome is a viable option.

- If ‘Pucklechurch and M4 to Shortwood’ location is not selected as a strategic growth location, then development should still be allowed east of Emersons Green to the line of the new M4 link, creating the new eastern urban edge to Bristol (Hitchings Family Trusts).

OFFICER RESPONSE

These alternative locations will be considered in the formulation of the Regulation 19 draft JSP and in light of the Plans vision and priorities, the evidence base and the sustainability appraisal.

Redevelopment of Filton Airport is already addressed as it included within the commitments in the South Gloucestershire Core Strategy.

COMMENTS ON THE EVIDENCE BASE

- Clear discrepancies between the approach set out within the supporting Topic Papers and the locations identified for growth in the Emerging Spatial Strategy as well as deficiencies in the Evidence Base supporting the Spatial Strategy. Therefore, the most appropriate Strategy has not been adopted when taking account of the reasonable alternatives (Bovis Homes Limited).
There is a degree of variance between the OAHN evidence informing the emerging JSP and the alternative assessments undertaken by business interests and representatives of the development industry (Bovis Homes Limited).

The test of the validity of evidence is not whether it has been undertaken by a process that conforms to guidance but whether an intelligent methodology has been applied to answer the right question making use of the appropriate information. Therefore Professor Bramley’s work should be welcomed, its findings should be regarded because they combine an appreciation of what drives housing need with a clear understanding of how targeted housing provision can produce positive and worthwhile outcomes against the objectives set for planning authorities and which the four Unitary Authorities espouse (Waddeton Park Ltd).

OFFICER RESPONSE

Detailed comments made on the evidence base will need to be considered as part of formulation of the Regulation 19 draft JSP. However an overarching point is the need to meet the tests of soundness as described in the NPPF, which includes the need to conform with national policy. Therefore the scope to depart from national policy and adopt instead an alternative “intelligent methodology” approach is limited.

GREEN BELT REVIEW

Support from around 10 respondents for a thorough Green Belt review to be undertaken before development sites are allocated in the Green Belt (respondents included local residents, developers, Business West, CPRE Avonside and the Forest of Avon Trust).

OFFICER RESPONSE

Support noted

ISSUES OF SOUNDNESS

The approach taken in respect of the Green Belt does not follow national policy (NPPF, paragraph 84) as it fails to “...consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary .....”.
• Guidance in the NPPF will apply if the JSP is intended to be a ‘development plan’ as such, it will need to be clear about what will be permitted and where, as well as strategic policies (NPPF, paras 154 and 156) (CPRE Avonside).

• To make the Plan sound, it should plan for sufficient housing to meet the Full Objectively Assessed Housing Need (Bloor Homes, Gallagher Estates).

• The Emerging Spatial Strategy is not sound as it is not based on a robust assessment of sustainable locations and is not seeking to redress the balance of Strategic Housing Locations and employment growth (Newland Homes landowners and others).

• NPPF (paras 14, 47 and 155) is very clear that Authorities should positively seek to meet their Objectively Assessed Needs when Plan-making. It is clear from the Urban Capacity Studies and SHLAA Reviews that additional land outside of existing urban areas will also be required.

**OFFICER RESPONSE**

• The Emerging Spatial Strategy meets the OAN 102,200 dgs, with some flexibility (105,000)

• The selection of development locations was directly linked to the ability to access the major employment centres by active and sustainable travel modes. This was a driving force in the preparation of the ESS.

• The JSP is explicitly intended to be a strategic document provide a broad framework for the formulation of UA local Plans. As such will not contain detailed Development Management policies.
Call for sites

Alongside the Joint Spatial Plan (JSP) consultation, locations with development potential were invited to be submitted. The following initial analysis provides an overview of the submissions.

SITE SUBMISSION NUMBERS

Initial analysis suggests that approximately 100 sites were submitted to the latest round of consultation, of which:

- Approx. 60 are within South Gloucestershire
- Approx. 20 are within BANES
- Approx. 20 are within North Somerset
- 4 are within Bristol

(Totals due not sum due to rounding).

SOUTH GLOUCESTERSHIRE (APPROX. 60 SITES)

Coverage of Strategic Development Locations (SDLS)

Land with development potential has been submitted within all the proposed JSP Strategic Development Locations (SDLs), some of which were received during earlier call for sites, and which have been submitted and/or amended through the recent consultation. Taking into account previously submitted sites, land availability at the proposed SDLs is now as follows:

- Buckover: Full land availability
- Thornbury: Full land availability (+ additional sites at other locations around the town)
- Coalpit Heath: Full land availability
- Charfield: Full land availability
- Yate / Chipping Sodbury: Limited land availability (+ additional sites at other locations around the towns)
Other Locations:

Sites were submitted in a wide number of different locations, a large proportion of which have been previously submitted and are known to officers as locations being promoted by the development industry. Given their significant scale (>1000 homes) the following submissions are of particular note:

- Warmley Urban Extension (Barratt & Bloors): ‘2500 homes, 3000 new jobs’.
- Woodlands Garden Village – Almondsbury (South West Strategic Developments): ‘2000 dwellings, local centre, primary school and public open space’
- Pucklechurch 'sustainable new urban village’ (IM Properties plc): ‘2600 homes, commercial uses and Green Infrastructure’.
- Land north of Hortham Village (Edward Ware Homes): ‘1250 homes, community uses, and education including a primary school’.
- Land east of Chipping Sodbury (Persimmon): Up to 1,200 homes.
- Tortworth Garden Village (Jarvis Jefferies Architects LLP): ‘Potential for 3,200 dwellings plus supporting infrastructure, employment opportunities and facilities in accordance with garden village principles’.

BATH AND NORTH EAST SOMERSET (APPROX. 20 SITES)

Coverage of SDLs

Sites have been submitted within both proposed Strategic Development Locations (SDLs), some of which were received during earlier call for sites, and which have been submitted and/or amended through the recent consultation. Taking into account previously submitted sites, land availability at the proposed SDLs is now as follows:

- Whitchurch. Limited land availability.
- North Keynsham. Almost full land availability

Other Locations

Sites were submitted in a wide number of different locations, a large proportion of which have been previously submitted and are known to officers as locations being promoted by the development industry. The majority of the sites submitted are less than 1,000 homes capacity, however some sites are adjacent or close to other submitted sites or are currently allocated sites therefore, collectively achieve a strategic level of development.
**WEST OF ENGLAND**

“BUILDING OUR FUTURE”

- West of Keynsham (1: Williams Family Trust/Nash Partnership, 2: Colliers/ and Persimmon Homes Severn Valley, 3: Lays Farm, Keynsham (Barratt/Pegasus)

- Land at South West Keynsham (Bloor Homes South West/Turley) 17 ha

- Upland, Keynsham (the Society of Merchant Venturers/Savills)

- Land East of Keynsham (Taylor Wimpey/Barton Willmore) 400 dwellings

- Land at West of Saltford (Mactaggart and Mickel/Tock Associates) (600 dwellings)

- Land to the South of Manor Road, Saltford (Crest Nicholson/Pegasus)

**BRISTOL (APPROXIMATELY 4 SITES)**

Two of the sites (Yew Tree Farm and Land at Ashton Vale) have been previously submitted and one site (Land to the West of Elsbert Drive) forms part of a larger site previously submitted. Three of the sites are south west of Bristol and another site (Land off Woodgrove Road, Henbury) has also been previously submitted.

**NORTH SOMERSET (APPROX. 20 SITES)**

**Coverage of SDLs**

Sites have been submitted within all proposed Strategic Development Locations (SDLs), some of which were received during earlier call for sites, and which have been submitted and/or amended through the recent consultation. Taking into account previously submitted sites, land availability at the proposed SDLs is as follows:

- Banwell (M5 to A38 corridor): Majority land availability plus interest to bring forward entire area.

- Churchill (M5 to A38 corridor): Land availability covers large part of area.

- Nailsea: Vast majority has land availability

- Backwell: Full land availability
Other Locations:

Sites have been submitted in a wide number of different locations, a large proportion of which have been previously submitted and are known to officers as locations being promoted by the development industry. Given their scale (>1000 homes) the following submissions are of particular note:

- Clevedon eastern extension (Hallam Land management): 2,500 – 3,000 homes linked to new J20 to Nailsea link road.
- Northeast and east of Weston-Super-Mare – (Mead Realisations)
- Chapel Pill, Easton-in-Gordano (Peter Brett Associates)
- Pill Green, Easton-in-Gordano: (Barton Wilmore)
- The Vale (Taylor Wimpey): 4,500 homes
- Fenswood Farm, south of Long Ashton (University of Bristol)
- A smaller location being promoted is to the northeast of Nailsea for around 600 dwellings

**OFFICER RESPONSE**

Under government planning policy, councils are required as part of preparing and keeping up to date their Local Plan, to undertake what is called a ‘call for sites’. Through the JSP developers/landowners.

Work to identify, review and map the sites submitted to this round of consultation remains ongoing. All submitted sites will be published on the online map alongside the publication of JSP representations.

It’s important to stress that the sites submitted are those that have been suggested for development by land-owners and/or the development industry. This does not imply that the West of England 4 Unitary Council’s support development at these locations.

Where any locations are considered appropriate these will be incorporated in the JSP spatial strategy. Further technical work setting how locations have been considered and reviewed will be published are part of the evidence base to support the next stage of the JSP.
Findings from Joint Transport Study Consultation

This chapter presents the findings of the West of England Joint Transport Strategy (JTS) consultation on the proposed Transport Vision. The JTS aims to provide a clear direction for the long-term development of the West of England’s transport system to 2036 and beyond. The JTS has been developed alongside the Joint Spatial Plan (JSP). The Transport Vision is the overall transport approach identified by the JTS for the delivery of growth in the region and addresses the combined impact of the current challenges on the network, growth from committed development in Local Plans and longer term growth up to 2036.

Method

PROCESS

The JTS consultation included an online survey hosted through the West of England JSP and JTS website https://www.jointplanningwofe.org.uk and respondents were able to provide written representations via email with supporting documents or postal letter. Summary information about the Transport Vision was provided on the website. Further detail was available in the Emerging Transport Vision Paper (November 2016).

The JTS online survey was open between 7th November and 19th December 2016. The deadline for written representations was extended until 10th January 2017 to allow for the proximity to the Christmas period. Respondents could complete the online survey and email or post a written representation.

A number of hard copy questionnaires were handed out at Bath & North East Somerset consultation events. The questions were the same as the JTS online survey but did not give closed question responses. These survey responses have therefore been treated as written representations, as they are essentially open responses.

The JTS online survey posed nine questions, comprising six closed (multiple choice) and three open questions. Details of the questions and a breakdown of the number of responses is provided in Table 1 and Table 2.

Response data was collated by the South Gloucestershire Council Business Administration team and then entered into specialist consultation software (iNovem) that was used for the collation and analysis of results.
Response Types

Online survey responses were received in the following ways:

- Closed questions (Questions 1-5 and 7); and
- Open questions (Questions 6, 8 and 9).

The closed questions were automatically processed by iNovem. The open questions required the manual reviewing of each response followed by ‘tagging’ of each question by topic in iNovem.

The nature of the consultation meant that people responded in a range of ways. While some submitted a complete survey response (closed and open questions answered), others simply condensed their response into one written representation (and did not answer any closed questions). Written representation responses were reviewed and are reported alongside the final questions (Question 8 and Question 9) of the survey, which asked for any other comments. The tagging of Question 9 was based on a pre-defined list of schemes that are in the Transport Vision. Any additional scheme suggestions were tagged under Question 8.

The final question of the consultation allowed respondents to express any other comments on the package. The open nature of this question meant that some responses included information relevant to other questions in the consultation: these responses have been included alongside the relevant closed question in the following sections.

Response Rate

There were 874 responses to the JTS consultation. This is a low response rate compared to the population of the West of England area, which is over 1 million people. However, it should be noted that experience from around the UK is that it is challenging to engage with large numbers of the public when consulting at a strategy level.

Written representations (emails and letters) were matched to online survey respondents by the South Gloucestershire Council (SGC) Business Administration team.

70 people answered the online survey and provided a written representation (either uploaded by the respondent or uploaded by the SGC Business Administration Team) – this is included in the 599 online survey respondents in Table 1.

Note that when the closed questions from the JTS online survey were analysed, this was based on 588 respondents to the online survey. Subsequent to the analysis of the closed questions, SGC Business Administration uploaded 11 hard copy questionnaires from consultation events. These are not included in the closed question analysis.
Table 1 – Responses to the JTS Consultation

<table>
<thead>
<tr>
<th>Responses to JTS Consultation</th>
<th>Number of People Who Responded</th>
</tr>
</thead>
<tbody>
<tr>
<td>Online survey completion (all, or part) including people who also provided a written representation</td>
<td>599</td>
</tr>
<tr>
<td>Written representations in addition to respondents to the online survey</td>
<td>275</td>
</tr>
<tr>
<td><strong>Sub-Total</strong></td>
<td><strong>874</strong></td>
</tr>
</tbody>
</table>

Table 2 shows the breakdown of the number of responses by question, as not all respondents answered every question of the survey.

Table 2 – Responses to the JTS Online Survey by Question

<table>
<thead>
<tr>
<th>Question Number</th>
<th>Question</th>
<th>Closed or Open Question?</th>
<th>Number of Respondents</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Is the level of ambition for the Transport Vision about right?</td>
<td>Closed</td>
<td>566</td>
</tr>
<tr>
<td>2</td>
<td>Do you think we are proposing the right mix of public transport investment (bus, rapid transit, park and ride and train)?</td>
<td>Closed</td>
<td>573</td>
</tr>
<tr>
<td>3</td>
<td>To what extent do you agree with the principle of diverting non-local traffic, including onto new roads, to accommodate public transport and cycling schemes?</td>
<td>Closed</td>
<td>577</td>
</tr>
<tr>
<td>4</td>
<td>To what extent do you agree with the concept of a light rail (tram) solution on some rapid transit corridors?</td>
<td>Closed</td>
<td>578</td>
</tr>
<tr>
<td>5</td>
<td>To what extent do you agree with using financial incentives and financial demand management at a local level to raise funds to help pay for the transport vision?</td>
<td>Closed</td>
<td>572</td>
</tr>
<tr>
<td>6</td>
<td>What kind of schemes would be most appropriate to deliver an upgrade to sustainable travel between the East Fringe and Bristol city centre?</td>
<td>Open</td>
<td>362</td>
</tr>
<tr>
<td>7</td>
<td>What is your level of agreement with the following elements of the package?</td>
<td>Closed</td>
<td>550 (average number of responses per element)</td>
</tr>
<tr>
<td>8</td>
<td>Are there any other schemes you would like to see in the package?</td>
<td>Open</td>
<td>465</td>
</tr>
<tr>
<td>9</td>
<td>Do you have any other comments about the proposed transport vision?</td>
<td>Open</td>
<td>466</td>
</tr>
</tbody>
</table>
For closed questions which ask for levels of agreement or disagreement (strongly agree to strongly disagree on a five point scale), the numbers are reported as ‘agree’ or ‘disagree’.

Characteristics of Respondents

Of the 874 survey respondents around half did not state their gender, age group or ethnicity (45%, 48% and 50% respectively). Due to the low response rate a detailed breakdown of demographics is not given, but there appears to be an under-representation of younger people and the majority of people who did respond are of a ‘white British background’. There were more male respondents (35% of responses) than female (20% of responses) and 45% of respondents did not state their gender.

In the case of the 275 written representations, it is not possible to determine their gender, age or ethnicity as they were not registered on the iNovem system, which automatically collects this data.

Table 3 and Table 4 show that there is a higher response rate from residents of Bath & North East Somerset, particularly the Keynsham/Saltford and Central Bath areas. This is reflected in the analysis of the open responses where there is a large number of scheme specific responses in relation to schemes at Saltford and to the East of Bath. ‘Other’ in Table 4 covers postcodes comprising less than 2% of the total responses.

Table 3 – Local Authority Residence of Respondents, by Area

<table>
<thead>
<tr>
<th>Local Authority</th>
<th>Total</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bath and North East Somerset</td>
<td>337</td>
<td>39%</td>
</tr>
<tr>
<td>Bristol, City of</td>
<td>114</td>
<td>13%</td>
</tr>
<tr>
<td>North Somerset</td>
<td>131</td>
<td>15%</td>
</tr>
<tr>
<td>South Gloucestershire</td>
<td>157</td>
<td>18%</td>
</tr>
<tr>
<td>Out of Area</td>
<td>135</td>
<td>15%</td>
</tr>
<tr>
<td>Total</td>
<td>874</td>
<td>100%</td>
</tr>
</tbody>
</table>
Table 4 – Postcode of Respondents, by Postcode Area

<table>
<thead>
<tr>
<th>Postcode</th>
<th>Area</th>
<th>Total</th>
<th>%</th>
</tr>
</thead>
<tbody>
<tr>
<td>BS31</td>
<td>Keynsham/Saltford</td>
<td>120</td>
<td>14%</td>
</tr>
<tr>
<td>BA1</td>
<td>Bath North and East</td>
<td>94</td>
<td>11%</td>
</tr>
<tr>
<td>BA2</td>
<td>Bath South</td>
<td>79</td>
<td>9%</td>
</tr>
<tr>
<td>BS48</td>
<td>Nailsea/Backwell</td>
<td>48</td>
<td>5%</td>
</tr>
<tr>
<td>GL12</td>
<td>Charfield/Wotton-under-Edge</td>
<td>40</td>
<td>5%</td>
</tr>
<tr>
<td>BS35</td>
<td>Thornbury</td>
<td>39</td>
<td>4%</td>
</tr>
<tr>
<td>BS14</td>
<td>Whitchurch</td>
<td>27</td>
<td>3%</td>
</tr>
<tr>
<td>BS36</td>
<td>Frampton Cotterell/Coalpit Heath</td>
<td>23</td>
<td>3%</td>
</tr>
<tr>
<td>BS40</td>
<td>Langford/Chew Stoke</td>
<td>20</td>
<td>2%</td>
</tr>
<tr>
<td>BS37</td>
<td>Yate/Chipping Sodbury</td>
<td>15</td>
<td>2%</td>
</tr>
<tr>
<td>Other</td>
<td>Other</td>
<td>201</td>
<td>23%</td>
</tr>
<tr>
<td>No response</td>
<td>No response</td>
<td>168</td>
<td>19%</td>
</tr>
<tr>
<td>Total</td>
<td></td>
<td>874</td>
<td>100%</td>
</tr>
</tbody>
</table>

Presenting the Findings

The remainder of this chapter presents the following findings comprising:

- Views on the level of ambition and support for the Transport Vision (based on Question 1);
- Views on the Transport Vision elements and schemes (based on Question 2, 3, 4, 6, 7 and 9);
- Views on financial incentives and financial demand management (based on Questions 5 and 9);
- Scheme suggestions from respondents (based on Questions 8 and 9);
- Further detailed analysis of the responses to closed questions;
- An overview of which statutory and non-statutory consultees responded (based on Question 9); and
- A summary and conclusions.
The results are presented in a different order to the JTS online survey to help draw out the key findings, starting with views on the different elements of the package.

Appendix 6 provides further information about the specific themes raised during the JTS consultation.

Level of Ambition and Support for the Transport Vision

Question 1 asks “Is the level of ambition for the Transport Vision about right?”

The purpose of this question is to gauge respondents’ views on whether they consider the Vision is ‘too ambitious’ or ‘not ambitious enough’. Figure 1 shows that a quarter of respondents believe the Vision’s ambition to be about right. Nearly half of respondents (48%) consider the Transport Vision as not ambitious enough, and 25% of respondents view it as too ambitious.

Respondents may interpret the term ‘ambition’ differently (for example, in terms of scale, cost or affordability). Respondents’ views on the specific schemes in the Transport Vision are also likely to influence their response to this question.

Figure 1 - “Is the level of ambition for the Transport Vision about right?” (566 respondents)

Transport Vision Elements and Schemes

This section presents the analysis of the questions relating to the types of schemes in the Transport Vision (Question 7, Question 2, Question 4 and Question 3).
VIEWS ON ELEMENTS OF THE PACKAGE

Question 7 asks “What is your level of agreement with the following elements of the package?” The options given are shown in Figure 2. The relevant open responses are covered later in this chapter.

Figure 2 shows that there are higher levels of agreement for improvements to rail, buses, area packages and cycling, with between 80% and 90% agreeing on the individual elements. There is higher support for road improvements (72% agree) compared with new roads (51% agree), however the latter is still a relatively high level of support.

The element with the highest number of respondents who strongly disagree is park and ride (28%). This appears to be influenced by local views on a specific park and ride proposal in the Transport Vision, rather than concern about park and ride in general. The second and third highest levels of strong disagreement refer to new road connections and freight management including consolidation centres (22% and 16% respectively), which also appear to be heavily influenced by local opposition to specific proposals.

Figure 2 - “What is your level of agreement with the following elements of the package?” (Average number of responses per element = 550)
VIEWS ON THE MIX OF PUBLIC TRANSPORT INVESTMENT

Question 2 asks “Do you think we are proposing the right mix of public transport investment?”.

This question covers bus, rapid transit, park and ride and rail. 58% of respondents disagree with the public transport mix, with only 21% in agreement, as shown in Figure 3. It is not possible to distinguish public transport modes within this question. Analysis of this question is inconclusive, as it potentially includes a range of views, for example:

- Concern that there is too much public transport investment;
- Concern that there is insufficient public transport investment; and
- Concern with specific public transport elements.

Further analysis is provided later in this chapter to understand the relationship between this question and other questions to better understand the drivers of people’s responses.

Figure 3 - “Do you think we are proposing the right mix of public transport investment” (573 respondents)

VIEWS ON THE LIGHT RAIL CONCEPT

Question 4 asks “To what extent do you agree with the concept of a light rail (tram) solution on some rapid transit corridors?”.

A high proportion of respondents agree with the concept of light rail on some rapid transit corridors (69%), with only 14% who disagree (Figure 4). The level of support identified in this question is consistent with the level of support given in Question 7 “What is your level of agreement with the following elements of the package?”.
Figure 4 - “To what extent do you agree with the concept of a light rail (tram) solution on some rapid transit corridors?” (578 respondents)

![Pie chart showing responses to the light rail (tram) concept question]

31% Yes, strongly agree
38% Yes, agree
7% Neither agree nor disagree
7% No, disagree
7% No, strongly disagree

VIEWS ON THE DIVERSION OF NON-LOCAL TRAFFIC TO ACCOMMODATE PUBLIC TRANSPORT AND CYCLING SCHEMES

Question 3 asks “To what extent do you agree with the principle of diverting non-local traffic, including onto new roads, to accommodate public transport and cycling schemes?”.

As shown in Figure 5, the majority (53%) of respondents agree with the principle of diverting non-local traffic, including onto new roads, to accommodate public transport and cycling schemes. 27% disagree with this principle.

From a scheme deliverability perspective, diversion of traffic is required to provide capacity for a number of Transport Vision schemes. Disagreement and objections may arise from directly affected respondents living on the corridors affected by diverting non-local traffic. No specific details of potential traffic diversions have been given; once details of diversion proposals are developed this could affect people’s future responses.

Figure 5 - “To what extent do you agree with the principle of diverting non-local traffic, including onto new roads, to accommodate public transport and cycling schemes?” (577 respondents)

![Pie chart showing responses to the traffic diversion question]

35% Yes, strongly agree
18% Yes, agree
14% Neither agree nor disagree
13% No, disagree
14% No, strongly disagree
Analysis of Open Responses

This section contains the analysis of the open responses. It focuses on comments on specific schemes in the Transport Vision (within Question 9) by quadrant for consistency with the Transport Vision topic paper:

- South West Area – Weston Super Mare to Bristol;
- South East Area – Bath to Bristol;
- North East Area – Yate and East Fringe to Bristol;
- North West – Thornbury, North Fringe & Avonmouth / Severnside to Bristol; and
- Bristol City Centre.

Open responses may cover schemes in more than one quadrant.

Table 5 – Question 9 Responses by Quadrant

<table>
<thead>
<tr>
<th>Quadrant</th>
<th>Number of Responses</th>
</tr>
</thead>
<tbody>
<tr>
<td>South West: Weston-super-Mare to Bristol</td>
<td>142</td>
</tr>
<tr>
<td>South East: Bristol to Bath</td>
<td>343</td>
</tr>
<tr>
<td>North East: East Fringe to Bristol</td>
<td>27</td>
</tr>
<tr>
<td>North East: Yate to Bristol and North Fringe</td>
<td>24</td>
</tr>
<tr>
<td>North West: Thornbury, North Fringe &amp; Avonmouth / Severnside to Bristol</td>
<td>77</td>
</tr>
<tr>
<td>Bristol City Centre Package</td>
<td>31</td>
</tr>
</tbody>
</table>

The tagging of Question 9 was based on a pre-defined list of schemes that are in the Transport Vision. Any additional suggestions for schemes were tagged under Question 8. Question 9 asks “Do you have any other comments about the proposed transport vision?”

Overall, the open responses to Question 9 were dominated by comments about road building and park and ride. Within these types of scheme (new roads and park and ride) there was a focus on specific scheme proposals. However, this should be viewed in the context of a low response rate and the sample is unlikely to be representative of the wider population of the West of England. Responses have not been disaggregated by respondents’ home postcode due to the low response rate to the online survey. However, analyses show that the largest numbers of responses are from areas where people had the most significant concerns about proposed schemes.
Based on analysis of the responses provided to Questions 7 and 9, it can be inferred that the responses to the closed responses are strongly influenced by specific scheme proposals. There is a clear correlation between objections to specific schemes in Question 9 and higher levels of disagreement with scheme types in Question 7. This issue is most marked for road schemes and park and ride proposals.

**SOUTH WEST – WESTON SUPER MARE TO BRISTOL OPEN RESPONSES**

142 respondents mention Transport Vision schemes located in the South West quadrant. 19 Transport Vision schemes in the South West quadrant were mentioned by respondents. The most frequently mentioned schemes (by number of respondents) were the M5 Link from Junction 20 to A370 (37 responses, approximately two thirds objecting), LRT City Centre to the Airport (28 responses mostly in support) and the Banwell & Churchill Bypasses (25 responses, approximately half objecting). These are very small numbers that are a sub-set of a low response rate. Generally in the South West quadrant there are concerns about the proposed new roads, particularly in terms of environmental concerns and impacts on the Green Belt. There was strong support for LRT (to the Airport) but with a low sample size. Note the relatively small numbers overall when inferring the level of support or opposition to specific proposals.

**SOUTH EAST – BATH TO BRISTOL OPEN RESPONSES**

343 respondents mention Transport Vision schemes from the South East quadrant. 20 Transport Vision schemes in the South East quadrant were mentioned by respondents. The most frequently mentioned schemes were focused around the East of Bath (park and ride, freight consolidation centre and East of Bath Link – 132, 89 and 58 responses respectively, mostly objecting) and Saltford Bypass (119 responses, mostly objecting). There are concerns about environmental impacts to the East of Bath, particularly on the Bath World Heritage Site and Cotswolds AONB, Green Belt and ecology. With the Saltford Bypass there are concerns about the impact on Green Belt land, community forest and the risk of housing infill. A large number of responses in relation to East of Bath and Saltford Bypass appear to have been driven by local interest groups.

**NORTH EAST – YATE AND EAST FRINGE TO BRISTOL OPEN RESPONSES**

51 respondents mention Transport Vision schemes located in the North East quadrant. 16 Transport Vision schemes in the North East quadrant were mentioned by respondents. The most frequently mentioned schemes (by number of respondents) are the M4 Link to Yate (11 responses) and M4 Link to A4174 Ring Road (10 responses).

To help inform development of a rapid transit option between the East Fringe and Bristol City Centre, Question 6 specifically asks “What kind of schemes would be most appropriate to deliver an upgrade to sustainable travel between the East Fringe and Bristol city centre?”.
Over a third of responses suggest Rapid Transit schemes, followed by bus improvements and cycling schemes.

In total 151 respondents suggested rapid transit as a scheme to improve sustainable travel between the East Fringe and Bristol City Centre. This is summarised in Figure 6. Of those respondents suggesting rapid transit, 131 specifically suggested light rail, and 29 suggested bus based rapid transit (note that some respondents suggested both forms of rapid transit).

Of the 131 respondents who suggested light rail, 81 did not suggest any specific route. More specific suggestions included routing via the Bristol to Bath Railway Path (23), routing to avoid the Railway Path (10) and the need to go underground (10). A number of other route suggestions were made by small numbers of respondents. There were no suggestions that light rail should be routed along the A420 (Kingswood) and only two respondents suggested routing along the A432. A small number of respondents made more than one route suggestion. These numbers are relatively small and should therefore be treated with caution.

Figure 6 - “What kind of schemes would be most appropriate to deliver an upgrade to sustainable travel between the East Fringe and Bristol city centre?” (362 responses)

NORTH WEST – THORNBURY, NORTH FRINGE & AVONMOUTH SEVERNSIDE TO BRISTOL OPEN RESPONSES

77 respondents mention Transport Vision schemes located in the North West quadrant. 15 Transport Vision schemes in the North West quadrant were mentioned by respondents. The most frequently mentioned schemes (by number of respondents) are the reopening of Charfield Station (29 responses), MetroBus extension to Thornbury (23 responses), and LRT via Severn Beach Line and Henbury Loop (14 responses).
BRISTOL CITY CENTRE TRANSPORT VISION OPEN RESPONSES

31 respondents mention Transport Vision schemes from the Bristol City Centre package. The most frequently mentioned schemes (by number of respondents) are strategic cycle routes on key corridors into the city centre (6 responses), enhancements in public realm (6 responses), and park and ride sites at the edge of the city (6 responses). There is a large overlap with schemes on radial routes into the city (which are covered by the four quadrants). There was an overall small number of responses – there is likely to have been a higher response outside of the city, as this is where many of the major infrastructure and JSP strategic housing locations are located.

While there may be fewer specific responses about the Bristol City Centre Package, a review of related key words was undertaken and showed that there is support shown generally for improved cycling facilities (including increased segregation), transport hubs and bus priority in the city. The issue of congestion in the city centre was recognised as a serious problem. Various ways of reducing congestion were identified, including support for congestion charging and workplace parking levies, although it should be noted that there was also some opposition to these measures.

Financial Incentives and Financial Demand Management

This section covers the findings of Question 5 which asked respondents about fiscal measures to manage travel demand. Open responses to Question 9 that mentioned road user charging, workplace parking levy or parking charges are also discussed in this section.

Question 5 asked respondents “to what extent do you agree with using financial incentives and financial demand management at a local level to raise funds to help pay for the transport vision?” in the form of a closed question.

Figure 7 - “To what extent do you agree with using financial incentives and financial demand management at a local level to raise funds to help pay for the transport vision?” (572 respondents)
A significant proportion of respondents (40%) were in support of the use of financial incentives and financial demand management at a local level to raise funds to help pay for the Transport Vision. A further (30%) neither agree nor disagree. This could be because people have no strong opinion one way or the other, particularly as details about charges or areas covered were not given.

**ANALYSIS OF OPEN RESPONSES**

Three categories of financial management were identified from the analysis of open responses: road user charging (including congestion charging), a workplace parking levy, and increases in parking charges. A total of 67 responses mentioned financial demand management as a whole, with some responses mentioning multiple categories in one answer. The individual categories received 53, 24 and 16 responses respectively for road user charging, workplace parking levy and increased parking charges, and in most cases the responses were supportive.

The closed question asks for views on the use of financial incentives and demand management to help in funding the implementation of the transport vision. Many of the open responses discussing demand management do not explicitly state how the money raised should be used and simply cite the schemes as methods for reducing congestion and discouraging car use. It cannot therefore be assumed that the respondents to the open question are necessarily in favour of the financing of the Transport Vision through these mechanisms.

**Scheme Suggestions**

Question 8 asks “Are there any other schemes you would like to see in the package?”. Respondents made suggestions for additional schemes in both Question 8 and Question 9, which have been collated into one list. There was a large number of general suggestions (e.g. “more cycling investment” and “more public transport investment”). Many specific suggestions were only made by one or two people, for example twenty two respondents suggested junction improvements, but no specific junctions were mentioned by more than two people. A number of frequent suggestions could be considered ‘business as usual’, for example school bus improvements.

In some cases respondents suggested schemes that were in the Transport Vision (e.g. 7 people mentioned M5 Junction 14 improvements): some respondents may not have read the Emerging Transport Vision Topic Paper (November 2016). In these cases the responses were tagged under the relevant schemes in Question 9.

Table 6 shows the most frequent additional schemes that respondents would like to see in the package, however the numbers are small.
Table 6 – Scheme Suggestions (464 respondents)

<table>
<thead>
<tr>
<th>Type of Scheme</th>
<th>Number of respondents</th>
</tr>
</thead>
<tbody>
<tr>
<td>Electric vehicle support</td>
<td>28</td>
</tr>
<tr>
<td>Integrated ticketing for bus, rail and tram</td>
<td>18</td>
</tr>
<tr>
<td>Public transport pricing</td>
<td>14</td>
</tr>
<tr>
<td>Motorcycle inclusion and facilities</td>
<td>11</td>
</tr>
<tr>
<td>M4/A4174/A4 to M5 (complete ring road)</td>
<td>10</td>
</tr>
</tbody>
</table>

Further Analysis of Responses to Closed Questions

INTRODUCTION

This section provides more detailed analysis and comparison of the responses to selected closed questions to better understand the relationship between questions and the drivers of people’s responses. The main focus has been on understanding the relationship between Question 7 (the level of support for different public transport components) and Question 2 (level of support for the proposed mix of public transport investment).

SUPPORT FOR PUBLIC TRANSPORT COMPONENTS VS. MIX OF PUBLIC TRANSPORT INVESTMENT

Table 7, Table 8, and Table 9 compare the results of Questions 2 and 7 to better understand the responses to Question 2, in particular the relatively low level of agreement with the proposed mix of public transport investment.

The analysis in Table 7 shows that 52% of respondents agree with the proposals for rail improvements but disagree with the proposed mix of public transport investment. 48% of respondents agree with the proposals for new railway stations but disagree with the proposed mix of public transport investment.
Table 7 – Question 7 and Question 2 Rail Elements

<table>
<thead>
<tr>
<th>Proposing the Right Mix of Public Transport Investment?</th>
<th>Agree</th>
<th>Disagree</th>
<th>Neither Agree nor Disagree</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rail Improvements</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Agree</td>
<td>20%</td>
<td>52%</td>
<td>18%</td>
</tr>
<tr>
<td>Disagree</td>
<td>1%</td>
<td>3%</td>
<td>1%</td>
</tr>
<tr>
<td>Don’t know</td>
<td>1%</td>
<td>3%</td>
<td>1%</td>
</tr>
<tr>
<td>New Rail Stations</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Agree</td>
<td>18%</td>
<td>48%</td>
<td>16%</td>
</tr>
<tr>
<td>Disagree</td>
<td>1%</td>
<td>6%</td>
<td>2%</td>
</tr>
<tr>
<td>Don’t know</td>
<td>2%</td>
<td>5%</td>
<td>3%</td>
</tr>
</tbody>
</table>

Table 8 shows that 40% of respondents agree with light rail routes but disagree with the proposed mix of public transport investment. Similarly, 35% agree with expansion of MetroBus but disagree with the proposed mix of public transport investment.

Table 8 – Question 7 and Question 2 Rapid Transit Elements

<table>
<thead>
<tr>
<th>Proposing the Right Mix of Public Transport Investment?</th>
<th>Agree</th>
<th>Disagree</th>
<th>Neither Agree nor Disagree</th>
</tr>
</thead>
<tbody>
<tr>
<td>Light Rail Routes</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Agree</td>
<td>17%</td>
<td>40%</td>
<td>14%</td>
</tr>
<tr>
<td>Disagree</td>
<td>1%</td>
<td>9%</td>
<td>2%</td>
</tr>
<tr>
<td>Don’t know</td>
<td>2%</td>
<td>9%</td>
<td>4%</td>
</tr>
<tr>
<td>Expansion of MetroBus</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Agree</td>
<td>16%</td>
<td>35%</td>
<td>13%</td>
</tr>
<tr>
<td>Disagree</td>
<td>2%</td>
<td>11%</td>
<td>3%</td>
</tr>
<tr>
<td>Don’t know</td>
<td>4%</td>
<td>13%</td>
<td>5%</td>
</tr>
</tbody>
</table>

Table 9 shows that 51% of respondents agree with bus network improvements but disagree with the proposed mix of public transport investment. Similarly 48% agree with area packages but disagree with the proposed mix of public transport investment. A significant proportion of respondents disagree with specific park and ride proposals, which directly impacts on their level of agreement with the mix of public transport investment: 27% of respondents disagree with the park and ride proposals and disagree with the mix of public transport investment.
The analysis shows that people’s views on the public transport mix are influenced by their views on specific types of scheme. The strongest level of support is for improvements to bus networks and rail services, new rail stations and area packages. There is also support for light rail and slightly less support for MetroBus.

However, there is a relatively high proportion of people who both disagree with park and ride and disagree with the proposed public transport mix. This appears to be the most important factor influencing people’s views on the mix of public transport investment. Furthermore, analysis of the open responses suggests that the high level of opposition to park and ride in general is driven by the opposition to the site to the East of Bath.

Stakeholders

150 stakeholders responded to the JTS survey and/or submitted a written representation. The responses from these organisations are included in the overall analysis within this chapter. Organisations who responded include:

- Key stakeholders including Highways England, English Heritage and Natural England;
- Five highway/planning local authorities, comprising Wiltshire Council, Somerset County Council, Gloucestershire County Council, Sedgemoor District Council and Stroud District Council. A further 39 town or parish councils responded;
• Both Bristol Port and Bristol Airport;

• Two health organisations responded comprising the West of England Public Health Partnership and North Bristol NHS Trust; and

• 34 interest groups responded, including Transport for Greater Bristol, South West Transport Network Railfuture, Friends of Suburban Bristol Railways, Sustrans and North Bristol SusCom.

A wide range of responses was received from the statutory and non-statutory consultees, with some responses dealing primarily with one scheme or one mode (either supporting or opposing) and others covering a wide range of suggested and new schemes across the whole area. Some respondents also stated that while they had no comments on the existing plans, they would like to be further involved when schemes become more detailed.

Summary

The low response rate to the JTS consultation means that it is difficult to draw robust conclusions about the views of people living in the West of England. However, over 150 stakeholders responded. A series of general observations have been identified and these are summarised below:

• There were 874 responses to the JTS consultation. 599 people completed all or part of the JTS online survey and 275 submitted written representations (emails or letters). A further 70 written representations were uploaded by online survey respondents;

• There is consistently high support for rail improvements, bus network improvements, area packages and cycling improvements;

• Almost half of the respondents stated that the Transport Vision should be more ambitious. Analyses indicate that respondents’ views on the specific schemes in the Transport Vision are likely to influence their response;

• There was a higher response rate from residents of Bath & North East Somerset, particularly the Keynsham/Saltford and Central Bath areas. This is reflected in the analysis of the open responses where there are a large number of scheme specific responses relating to schemes at Saltford and East of Bath;

• The element with the highest number of respondents who strongly disagree is park and ride (28%). This appears to be driven by opposition to specific proposals, in particular the site to the east of Bath;
• Compared to other elements in the Transport Vision, there is lower support for new roads (51% agree), although there is stronger support for road improvements (73% agree). Analysis of the open responses has highlighted concerns about specific proposals, for example Saltford Bypass;

• There is overall support for the concept of light rail. Light rail is also the most frequent suggestion to improve sustainable travel between the East Fringe and Bristol City Centre;

• There is relatively high support for financial incentives and financial demand management. This represents a relatively positive response but future opinions would be dependent on the provision of information on more specific proposals (including area of coverage, charges and exemptions); and

• A wide range of additional schemes were suggested, but with relatively small numbers of people suggesting the same scheme. The most frequently mentioned scheme is electric vehicle support, which was suggested by 28 people.

For further information about the specific themes raised during the JTS consultation refer to Appendix 6.