

## **WEST OF ENGLAND JOINT SPATIAL PLAN – FOBRA ANSWERS TO QUESTIONS IN THE EMERGING SPATIAL STRATEGY DOCUMENT**

### **Consultation Questions**

Consultees were invited to answer six questions, and in answering these, the PSC reflected on FoBRA's submitted preferences to the first consultation. Because nearly three-quarters of respondents prefer an amalgam of Scenarios 1 and 2, the PSC was not convinced that there would be much to be gained by merely re-iterating FoBRA's previously-held views [even though these made good sense to us!] and recommended FoBRA accepted the broad consensus on the chosen spatial scenarios because it would be counter-productive to do otherwise. Answers to the questions posed are as follows:

#### **Q1. Does the proposed strategy make adequate provision to address housing needs?**

No. The strategy states the target, and the Federation of Bath Residents' Associations (FoBRA – that represents some 4,500 residents) does not dispute this, but the successful delivery of 1610 affordable homes each year until 2036 would be a huge challenge when, in contrast, actual delivery between 2006 and 2015 was only 898 per year. The option of increasing the overall market housing figure to bring forward more sites which in turn may deliver more affordable homes may have been explored, but we agree that is very unlikely that it will lead to the delivery of affordable housing to meet the need identified, and an oversupply of market homes may create an imbalance in job and homes and would further inflate the number of homes needed, and provide additional growth pressures on the transport network. We agree it is unrealistic and unsustainable for the JSP alone to meet the full numbers of affordable homes identified. So, while FoBRA believes that the plan probably identifies the right overall number of market and affordable homes, but we are not able to make an objective and professional judgement on the numbers or the split. However, assuming the affordable homes identified numbers are correct, we believe it would perhaps be disingenuous to include 20% starter homes in the mix as these would dilute the actual number of traditional affordable homes needed.

#### **Q2. How can the delivery of homes, particularly affordable homes be increased?**

While FoBRA would agree that the Bath area is highly constrained, this is true also to a somewhat lesser degree of the WoE area more broadly. So, while the strategy is right to aim to minimise development within the Bristol-Bath GB, we would suggest that more new settlements in the Severn Vale will be necessary in the longer term to relieve pressure on the interacting Bath-Bristol housing market systems overall. We admit that the lead times would be long but a pessimistic but realistic view is that the housing situation will only get worse over time. We would thereafter argue that in addition to the plan to include certain Green Belt sites south east of Bristol, action to explore more new settlements now will make provision easier at a later stage. The investigation of a garden village at Buckover and the expansion proposals for Thornbury and Charfield are fully supported.

Given the serious pressures on land in the WoE area, particularly with the decision to protect the Green Belt, FoBRA is generally in favour of increasing density of development to minimise the need for land, but only if the quality of that development is good. High density development need not be poorly executed; after all, historic Georgian Bath is a shining example of high density development which is aesthetically beautiful, with excellent social spaces. However, while Bristol may have minimum room size requirements (aka DCLG-guidance for space standards) B&NES havers in the face of developer pressure so we would oppose raising density in ways which will create houses unfit for purpose but which simply raise profitability; one recalls the background leading to the establishment of the Parker Morris standards in 1963. It should be noted that a recent report from Sheffield Hallam University found that in 2012-15 the biggest private housebuilders profits trebled while they only increased construction by a third.

FoBRA still believes that Unitary Authorities must first agree that they have planned for both the right number of market, affordable homes and separately, starter homes. Each Local Authority must encourage developers, by stronger redefined planning management means, to prioritise on homebuilding rather than developing the more economically attractive and profitable student

accommodation (PBSA). Bath remains like Dodge City with developers snapping up every available site for student accommodation and taking brownfield land that could be used for much needed housing for a wide variety of existing permanent and would-be new residents. This leads to increasing pressure to build houses in the Green Belt and AONB. Local Authorities must be able to resist the pressure to release more land for development and the Government must produce proposals for ensuring the backlog of approved and under-developed land is actually built on, with suitable penalties for developers who fail to do so in a reasonable period. To reduce the problem of landbanking by developers and the challenge of raising the rate of construction, Local Authorities should attach an obligation to build within a deadline to planning permissions.

**Q3. Does the proposed strategy make adequate provision to meet WoE's economic needs?**

Not convincingly. In answers to the first JSP consultation, and with a Bath-centred focus, FoBRA argued that the adoption of primarily Bristol-centric Scenarios 1 and 2 or indeed an amalgam of the two, could jeopardise Bath's and NE Somerset's sustainable economic development and that B&NES also needed more housing and the implementation of an agreed Transport Plan, plus its associated infrastructure. We believed that transport plans should be indivisible from development plans and Scenario 3, even though this also had a distinctly Bristol bias, it had many advantages which should be best integrated it with another scenario. FoBRA felt that Scenario 4 was attractive not just to Bath and B&NES, but to other WoE local authorities as well because it was not Bristol-centric. In economic terms, it was less-focused on Bristol and had the opportunity to target investment and to support local objectives: homes and jobs, although less effective perhaps in transport terms. FoBRA therefore concluded that redefined Scenarios 3 and 4 would be the most advantageous for Bath and B&NES in economic terms and submitted its comments accordingly. However, FoBRA recognises that the outcome of the first consultation did not favour the brave with nearly three quarters respondents preferring the emerging spatial strategy being either one or a combination of Scenarios 1 and 3, so defers to the majority because to do otherwise would arguably be counter-productive. Nevertheless, FoBRA still believes that, economically at least, combined scenarios 3 and 4 would be best for the West.

**Q4. Does the preferred spatial strategy and the locations identified meet the plan's strategic priorities and vision?**

Not fully: the spatial strategy must not be constrained by WoE myopia. 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 – access which will become easier with the proposed new Eastern Park and Ride and the proposed Corsham railway station. FoBRA would urge more vigorous collaboration with Wiltshire Council to this end.

**Q5. Are there any reasons why this strategy or identified locations could not be delivered?**

A wide range of risks could derail the potential of this strategy, not least political will (change of national and local governments) and secure development and infrastructure funding. Moreover, it is believed that the forecasts used are pre-Brexit. The investment and employment uncertainty that this may cause could stretch well into the future for universities, high tech, health and the hospitality trade. There is in addition the likely economic effects of the potential 8-year delay in completing electrification of the Great Western Railway between London and Bristol, and especially the downgrading of the London to Bath line. This last-minute decision could well discourage much-needed economic investment in Bath.

**Q6. Is the preferred spatial strategy the most appropriate strategy when considered against the reasonable alternatives?**

Yes, possibly, but arguably second to a combination of Scenarios 3 & 4. See FoBRA's answer to Q3 above.

