

# View Response

## Response Details

**From** Christina Biggs - Friends of S...

**Date** Started: 27 Feb 2021 17:45. Last modified: 28 Feb 2021 21:41

**Status** Complete

**Response ID** #903727

## Information on the Local Plan

To view the Phase 1 Issues and Approaches document including the sections referred to in this questionnaire, please visit [www.southglos.gov.uk/LocalPlan2020](http://www.southglos.gov.uk/LocalPlan2020).

## 1: Understanding who is responding

Please help us understand the type of groups and people that are responding and engaging with the preparation of our new Local Plan, by choosing which one of the following stakeholder groups you best represent.

You must choose one option to be able to submit your response.

You must provide an answer to this question.

Community Group

If other, please state:

The Friends of Suburban Bristol Railways is a rail user group focused on campaigning for rail service improvements in the Greater Bristol Area. Our

campaign goals are summarised in the FoSBR Rail Plan. For South Glos Council this includes support for the MetroWest Phase 2 services to Gloucester, reopening of the Henbury Line and completion of the Henbury Loop; campaigning for the replacement of the footbridge at Pilning station; a new station at Coalpit Heath; extension of the Tytherington Quarry Line to Thornbury and use of the Westerleigh Oil Depot line as a light rail route into north Bristol; and support for a mass transit system as street-level light rail. Please note that the JLTP4 does not contain all our proposals and we will be highlighting these as we continue through this questionnaire.

## 2: Issues

We have set out 55 issues which our Local Plan will need to consider.

The 55 issues are set out in **this section of our document**.

Do you agree that these are the right issues for our plan to consider?

- Yes
- No
- Don't know

## 3: Issues

Would you like to comment on any of the issues or add new issues? Please note the name of the issue in your comments, or tell us what additional issues you think our plan should consider.

The main issue we would like to emphasise is the necessity for adequate

public transport to any new housing. Rail is the most low-carbon form of public transport and Bristol has three freight lines which are being converted to passenger rail. We would urge strongly that all housing should be located at a rail station, whether existing now or on an existing rail line, or on a freight line that can be converted to passenger use.

Although the Local Plan refers to the WECA Joint Local Transport Plan JLTP4, it should be emphasised that not all rail stations are equally likely to be delivered and the JLTP4 makes important omissions, for example for a rail station at Coalpit Heath. Although a heavy-rail connection from Thornbury to Yate with a direct train to Bristol would need the remodelling of Westerleigh Junction, which would necessitate significant third-party funding, there is the possibility of changing trains at Yate, or using the Westerleigh Oil Depot line from Yate to Emerson's Green and down the M32. These projects are however not addressed in the WECA JLTP4 and so it must not be assumed that they could be delivered within the timetable of this Local Plan without proactively approaching Network Rail via WECA.

## 4: Priorities

Do you agree with the potential priorities?

- Yes
- No
- Don't know

## 5: Priorities

Do you have any comments on the potential priorities?

The concept of building on brown land first is a good one, but only if there is adequate public transport - for us this means rail whether "heavy" (conventional) or "light" rail, as set out in the Transport for Greater Bristol Alliance Integrated Transport Plan at [tfgb.org](http://tfgb.org)

## 6: Strategy- Where will development go

Do you agree with the five building blocks (Urban Areas, Urban Extensions, Market Towns, Rural Villages, New Settlements)?

- Yes
- No
- Don't Know

## 7: Strategy- Where will development go

Do you have any comments on the five building blocks (Urban Areas, Urban Extensions, Market Towns, Rural Villages, New Settlements)?

Yes in principle, but only where a railway station or light rail line can be built, or a short walk, cycle or bus ride away. MetroBus on its own is not sufficient. FoSBR support the principle of Transport Focussed Development and commend the CPRE (Campaign for Protection of Rural England) detailed response on where housing should be located and in particular the need for higher density housing using the 3-4 storey Victorian build model. We also

commend the approach taken by the ConnectedCities campaign group who advocate building within 1km of rail stations in a highly car-free environment, with green fingers extending radially to keep the rural environment.

## 8: Strategy- Where will development go

Do you agree with the initial guiding principles?

- Yes
- No
- Don't Know

## 9: Strategy- Where will development go

Do you think we have missed any key, initial guiding principles?

Yes. There is no mention of existing or potential rail stations in this plan apart from one map which shows only operational stations - and no mention of Pilning as a rail station for incoming commuters to reach Severnside businesses, and a potential Park and Rail site for Thornbury and other villages to the north.

For Thornbury to be an "Urban Lifestyle" site the Thornbury Rail line must be reopened at least as far as a Park and Rail at Tytherington Quarry. This in turn needs engagement with WECA and Network Rail to bring the Thornbury freight line into passenger use, initially as a shuttle service to Yate and changing trains to the MetroWest Phase 2 service from Gloucester, and then

either making use of the Westerleigh Oil Depot line for light rail to Emerson's Green and down the M32, or reinstating the Ram Hill loop to connect the Oil Depot line back to the main Paddington Line with a new station at Coalpit Heath.

## 10: Urban Lifestyles

Do you agree with our Urban Lifestyles approach to investigate further change and growth in our urban areas?

- Yes
- No
- Don't know

## 11: Urban Lifestyles

Do you have any comments on the Urban Lifestyle approach to investigate further growth and change in our urban areas?

Only if the Urban Lifestyle area has a rail station with at least an hourly service, preferably half-hourly or every fifteen minutes. It is irresponsible in the extreme to generate road traffic which will only cause congestion and air pollution in centres like Greater Bristol.

Patchway Station must be developed with an adequate bus service and passenger footbridge into Bradley Stoke. The Henbury Loop line must continue to both Avonmouth and the Severn Beach Line, and possibly Severn

Beach (via a chord at Holesmouth) as set out in the WECA Rail Plan. Pilning Station must be developed to serve the growing needs of Severnside, to enable commuters to travel in from Wales and cycle to work from the station.

There is no mention of the location of employment which must be co-located with housing or risk further gridlock in Northern Bristol. There must be an adequate rail service on the Henbury Line - half-hourly not hourly - connecting to Parkway Station and serving the Brabazon Arena in partnership with YTL.

Coalpit Heath station could be located on its previous site on the level ground at Ram Hill business park which is easily reached from Winterbourne and Emersons Green, or nearer to the Badminton Road bus routes.

## 12: Urban Lifestyles

Do you agree with the areas where the Urban Lifestyles approach should be investigated?

- Yes
- No
- Don't know

## 13: Urban Lifestyles

Do you have any comments on individual locations we have set out, or other locations which should be investigated for an urban lifestyles approach for further growth and change in our urban areas?

Thornbury and Buckover in particular cannot be considered as an Urban Lifestyle area solely on the strength of a new station at Charfield. Charfield is the opposite direction from Bristol and very few people will bother to drive in the wrong direction. No work should be carried out to develop Thornbury as an Urban Lifestyle area unless Thornbury Rail Line is reopened and adequate infrastructure such as drainage, sewage and electricity and broadband put in place. MetroBus is totally inadequate in terms of transit time into Bristol and will be subject to the usual pinch-points at roundabouts and bridges. FirstBus have publicly reported the congestion that existed for the M1, M2 and M3 routes. Please investigate a light rail line from Thornbury to Yate and the Westerleigh Oil Depot Line to Emersons Green as a matter of urgency, and talk to the Bath Trams Area Association and the Transport for Greater Bristol Alliance about their tram plan which includes Thornbury.

## 14: Creating Sustainable Rural Villages and Settlements

Do you agree with our proposed approach to the national policy issues highlighted, like flood risk, the Cotswolds Area of Outstanding Natural Beauty, Green Belt, and other planning considerations and issues?

- Yes
- No
- Don't know

## 15: Creating Sustainable Rural Villages and Settlements

Do you have any comments on our proposed approach to investigate an appropriate level of growth in our rural villages and settlements?

Only if new housing is located near a railway station or on a light rail route, to avoid generating more road traffic.

## 16: Creating Sustainable Rural Villages and Settlements

Are there any other planning issues you think we should consider?

We recommend that you contact Brian Love at ConnectedCities who can explain their approach of siting all development near rail stations and embedding a car-free community from the start.

## 17: Policies

Do you agree with the range and scope of policies we are proposing to include in our new Local Plan?

- Yes
- No
- Don't Know

## 18: Policies

Do you have any comments on the range and scope of policies we are proposing?

We are very concerned that S Glos has failed to prioritise siting development at existing rail stations or potential rail stations on existing passenger or

freight lines. The evidence is that this will put more cars on the road and cause further gridlock to North Bristol. It seems irresponsible to plan this level of development with so little consideration of existing public transport links and rail in particular.

Evidence collected by the Centre for Cities indicates that road traffic levels in September 2020, during Covid, bounced back to higher than pre-Covid traffic levels, particularly in Bristol. This evidence was presented to the WECA Scrutiny transport sub-group in the autumn of 2020.

The evidence is that rail travel has the lowest carbon footprint and causes the highest uplift in land value. Rail services do not only take passengers off the road but also transport cycles and light freight and disabled passengers, and stations can become rail-bus heads and a focus for car hire and walking. Britain and the Bristol area in particular have many local rail stations that young people like to use. S Glos will attract many more younger people by having adequate rail links.

## 19: Appendix 2: Draft policies: Climate Change and Mitigation

Do you agree with our proposed policy approach?

- Yes
- No
- Don't Know

## 20: Appendix 2: Draft policies: Climate Change and Mitigation

Do you think there are any other issues we should consider in this policy?

If S Glos is to be serious about climate change, it should not build houses where people will need to own a car. This is sheer irresponsibility. S Glos already sends more cars into Bristol than any of the other surrounding local authorities - see the FoSBR submission to the WECA JLTP4 consultation. We recommend that S Glos learn from BANES and N Somerset who have many more passengers taking rail journeys, and make sure that people can travel to work or leisure by train. People should be able to travel car-free by walking or cycling or taking a bus to the nearest train station. Please do not support further road-building such as WECA's plans for a new motorway junction at Emerson's Green and rural bypasses round Coalpit Heath and Yate. Instead we strongly urge S Glos to talk to people like Nicholas Falk of Urbed who can explain the principles of co-planning housing with local rail. We would be happy to make such an introduction.

## 21: Appendix 2: Draft policies: Energy Management in New Development

Do you agree with our proposed policy approach?

- Yes
- No
- Don't Know

## 22: Appendix 2: Draft policies: Energy Management in

## New Development

Do you think there are any other issues we should consider in this policy?

There should be more consideration of the impact of shopping areas on road traffic - Cribbs Causeway should be served by a shuttle bus to Pilning and Patchway stations and a light rail link to the Henbury Line.

The dominance of the car must end or there will be no end to road congestion. Building more roads will only increase the number of cars on the road. People must be actively dissuaded from using a car at the outset and public transport must be in place before any houses are built and bad habits started.

## 23: Appendix 2: Draft policies: Renewable and Low Carbon Energy System

Do you agree with our proposed policy approach?

- Yes
- No
- Don't Know

## 24: Appendix 2: Draft policies: Renewable and Low Carbon Energy System

Do you think there are any other issues we should consider in this policy?

«No response»

## 25: Appendix 2: Draft policies: Creating well-designed places

Do you agree with our proposed policy approach?

- Yes
- No
- Don't Know

## 26: Appendix 2: Draft policies: Creating well-designed places

Do you think there are any other issues we should consider in this policy?

A well-designed place is a locality which is car-free. People should not need to use the car to get to local amenities, to work or school or for leisure. The shopping street should be pedestrian-only and have bus-only gates. The only vehicles needing access should be delivery vehicles and this can take place before and after shopping hours. The high street should be pollution and noise free and using trees and grass to create a holiday mood and encourage people to sit outside cafes. There are many experts out there who can design the community around the person and not the car. We recommend that S Glos consult with Jon Usher at Sustrans who can help with place-making, as well as the new Liveable Neighbourhoods campaign in Bristol, as well as the Car-free cities campaign and the BANES council who are taking this seriously in their Transport Delivery Action Plan.

## 27: Appendix 2: Draft policies: Parking Requirements

Do you agree with our proposed policy approach?

- Yes
- No
- Don't Know

## 28: Appendix 2: Draft policies: Parking Requirements

Do you think there are any other issues we should consider in this policy?

Parking should be provided at all rail stations, especially rural hubs such as Severn Beach and Pilning, as well as cycle storage and bike hire.

Parking should not be allowed on the high street and should be dissuaded in general to incentivise people to walk, cycle or take the bus on their usual week. Parking should only be allowed for people carrying heavy goods and should be time-limited. Workplace parking levy will incentivise places of work to promote a car-free commute for all their employees.

Parking should not be considered as a right for customers, and businesses should be encouraged to use electric cargo bicycles where possible.

We recommend that S Glos council consult Dr Steve Melia at the University of the West of England about roadspace removal. When you are building housing you have the chance to create a car-free environment from the outset. Cycles on trains should be the first choice commuting method.

### 29: Appendix 2: Draft policies: NSIPs and Related Development

Do you agree with our proposed policy approach?

- Yes
- No
- Don't Know

### 30: Appendix 2: Draft policies: NSIPs and Related Development

Do you think there are any other issues we should consider in this policy?

«No response»

### 31: Appendix 2: Draft policies: Nuclear New Build

Do you agree with our proposed policy approach?

- Yes
- No
- Don't Know

### 32: Appendix 2: Draft policies: Nuclear New Build

Do you think there are any other issues we should consider in this policy?

«No response»

### 33: Appendix 2: Draft policies: Oldbury A Station - Decommissioning

Do you agree with our proposed policy approach?

- Yes
- No
- Don't Know

### 34: Appendix 2: Draft policies: Oldbury A Station - Decommissioning

Do you think there are any other issues we should consider in this policy?

Decommissioning Oldbury station would be less harmful to the environment if a temporary rail line were built to take waste away by rail freight rather than lorry or large ship. This could then be continued as a passenger line for Thornbury. Building a new power station at Oldbury would however generate continuing hazardous waste.

### 35: Appendix 2: Draft policies: Radioactive Waste

Do you agree with our proposed policy approach?

- Yes

- No
- Don't Know

## 36: Appendix 2: Draft policies: Radioactive Waste

Do you think there are any other issues we should consider in this policy?

Radioactive waste must be carefully disposed of and is safer to transport away by rail than by road. There is limited land in the area for storage of waste and there is little local expertise with this. Any radioactive waste should be disposed of in accordance with the procedures of the operator and certainly not be kept near the site of Oldbury.