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Part B

This section will need to be completed for each representation made. Please photocopy or download from the council's website additional copies of Part B as required.

Organisation or Name Bristol Food Policy Council

1. To which part of the Site Allocations and Development Management Policies (SA&DMP) does this representation relate?

Development Management policy no.	DM24	Site Allocation ref. no.	n/a	Designation name	Safeguarded Park and Ride sites - Transport Links
Paragraph no.	2.24.1 – 2.24.2	Page no.	40-41 (Policies Map 15)		

2. Do you consider the SA&DMP is 'sound'?*

*The considerations relating to a development plan being sound are explained in the National Planning Policy Framework (paragraph 182)

Yes No

If you ticked the 'No' box, do you consider the SA&DMP is unsound because it is not:

- (1) Positively prepared Yes
- (2) Justified Yes
- (3) Effective Yes
- (4) Consistent with national policy Yes

3. Do you consider the SA&DMP complies with the legal / procedural requirements for preparing a development plan?

Yes No

4. Please give details why you consider the SA&DMP is unsound or not legally compliant. Please be precise as possible. If you wish to support the soundness or legal compliance of the SA&DMP please also use the space below to set out your comments

Summary

The inclusion of safeguarded land for the M32 park and Ride is unsound, because the M32 Park and Ride is currently undeliverable due to lack of secured funding. The land should not be safeguarded for a future point at which funding becomes available because:

1. The designation is contrary to the NPPF.
2. There is no clear prospect of future funding within any realistic timeframe, meaning that the M32 P&R is **not deliverable**.



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3. The continued safeguarding of the site prejudices the delivery of Bristol's Core Strategy Vision and numerous policies and objectives of the Core Strategy. This DPD is therefore **ineffective** in delivering the overall aims of the Core Strategy. The continued safeguarding of the site will also prejudice delivery of elements of the West of England joint strategy.

4. Current evidence used to justify an M32 Park and Ride dates from 2007-8 or even earlier. Given the huge changes expected in patterns of car usage as oil prices rise and public transport infrastructure improves, this evidence will be out of date long before there is a realistic possibility of delivering the M32 P&R. The safeguarding of the land is therefore **unjustified**.

5. There is no proper evidence base for safeguarding land for a Park and Ride. There is no clear identification of the desired objectives for a P&R; no proper assessment of alternative ways to deliver those objectives; no proper cost-benefit analysis that takes into account the value of the land and the opportunity cost of building on it. We will demonstrate that the continued safeguarding of the land is therefore **unjustified** and **ineffective when considered against other alternatives**.

6. Park and Ride is an inherently ineffective means for reducing car traffic. The inclusion of the safeguarded land is therefore **ineffective** in delivering BCC's stated policy aim of reducing car traffic in the city.

1. The designation is contrary to the NPPF

- Paragraph 87 of the NPPF states that inappropriate development is, by definition, harmful to the green belt and should not be approved except in very special circumstances. Paragraph 90 refers to local transport infrastructure in the green belt. The M32 Park and Ride site is within the Green Belt and is part of the Strategic Green Infrastructure Network (Policy BCS9 and diagram 4.9.1 in the Core Strategy). No justification for the development of this site in the Green Belt is given within the local plan.
- The site of the proposed M32 park and ride site is Grade 1 or 2 Agricultural Land so is covered by paragraph 112 of the NPPF that highlights the economic and other benefits of agricultural land.
- Paragraph 177 of the NPPF that there needs to be a "reasonable prospect that planned infrastructure is deliverable in a timely fashion. There is no funding in place for the M32 park and ride site, or reasonable prospects that the funding will become available with the plan period.

Therefore the designation of the M32 park and ride site falls on all these tests.

2. The M32 P&R is not deliverable

The land should not be safeguarded for a future Park and Ride because there is no realistic prospect of delivering the project within any reasonable timeframe.

- The M32 Park and Ride was dropped from the BRT3 scheme following a request from central government for cost reduction. This indicates clearly that both local and national government see the P&R as a dispensable component of regional transport infrastructure, offering low value for money.
- Bristol City Council's Community Infrastructure Levy Funding Gap Background Paper (2/3/2012) identifies the M32 P&R as having a likely cost of £15,500,000, with no current or foreseeable funding; this shortfall forms part of a general funding shortfall for Bristol's infrastructure of £276,052,000 for the period covered by the Core Strategy. In this context it is almost impossible to see any realistic prospect of delivering the P&R.



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- The West of England Joint Strategic Framework gives no delivery timescale for the M32 P&R. Despite covering the period to 2026, the JSR is unable to commit even to 'delivery before 2026' for the project. This demonstrates very clearly that the project has been assessed as being undeliverable for the foreseeable future.

3. The continued safeguarding of the site prejudices the delivery of Bristol's Core Strategy and other regional strategy

- In **Bristol's Core Strategy**, the Spatial Vision and Objectives introduction states "In order to tackle congestion and pollution our overarching vision is for a less car dependent city and an emphasis on walking, cycling, buses, rapid transit and rail". An M32 Park & Ride by necessity must be driven to and is therefore not a car-reduction measure and does not support this vision. **Policy DM23 2.23.4** (SA/DMP) states that council prepared Transport Assessments/Travel Plans have the 'aim of reducing reliance on cars and encouraging walking, cycling and public transport.' That means public transport which does not involve car use.
- One of the key challenges of climate change will be food security. As seasonal weather patterns become increasingly disrupted, crops and yields will be vulnerable. High quality agricultural land will be increasingly valuable to ensure food supplies; good land adjacent to cities will be doubly valuable because of reduced food miles. In this case, a stretch of Grade 1 Agricultural Land directly adjacent to Bristol will be an extremely important asset in delivering the Core Strategy aim of meeting the challenge of climate change.
- The **Core Strategy** para 3.2 states that it aims to deliver "A city which reduces its carbon emissions and addresses the challenges of climate change". Therefore a policy which increases spending on car-based infrastructure which is not sufficiently proven to have such an impact is not in keeping with this aim.
- The safeguarding of this site contravenes **The Strategic Environmental Assessment for the West of England Joint Local Transport Plan 3** which states: *"Soil erosion is a key concern in the South West. Soils and agricultural land are also under pressure from new development. Soil is needed for food production and serves a number of other uses (such as cycling of nutrients, and storage of carbon). The protection of soil is therefore an important consideration in sustainable development.*
- The safeguarding of this site contradicts or undermines a number of other policies that are set out in **Bristol Local Plan - Site Allocations and Development Management Policies (March 2013 publication document)**.
 - (i) The site in question has historically provided Bristol with fresh fruit and vegetables as it's Market Garden Quarter due to the extremely high quality of the soil. This site allocation contradicts **policy DM26 Local Character and Distinctiveness General Principles** (Publication version March 2013) which state: "Design of proposals will...contribute towards local character and distinctiveness by: (i) 'responding appropriately to and incorporating existing land forms, green infrastructure assets and historic assets and features.(ii) respecting, building upon or restoring the local pattern and grain of development, including the historical development of the area.
 - (ii) It also undermines **Policy DM14: The Health Impacts of Development** which refers to the aims of the Bristol Core Strategy to '*deliver a safe and healthy city where development contributed to reducing the causes of ill health, improving the health and wellbeing of the local population and reducing health inequalities*". A Park & Ride on this site would destroy valuable, high grade agricultural land that is required for a resilient local food system, thereby undermining the ability of the City to establish a thriving food growing industry close to its markets and the range of opportunities for building good health that local food growing is proven to provide. This development will also have negative impacts on people's health and the health of natural systems in terms of increasing air pollution and destroying established habitats and ecosystems. In accordance with this policy, any Park & Ride proposal would have to have systematic



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health impact assessments that relate to the loss of health benefits which projects such as Feed Bristol are beginning to undertake through their new partnerships with probation and other mental and physical health services. The success of such projects will be placed in severe jeopardy unless the P&R site allocation is removed.

- The site in question is in the **Green Belt**, is part of the **Stapleton and Frome Valley Conservation area** and is **Grade 1 and/or 2 agricultural land**. This necessarily affords the site certain protection from development that would compromise or undermine this status and quality.

4. The evidence base for a Park and Ride will be outdated

The current evidence base for an M32 Park and Ride dates back to 2007-8 or even earlier. As stated above, the West of England Joint Strategic Framework gives no timescale for the delivery of the project, despite giving timescales of 'before 2026' for many other schemes. If the M32 P&R cannot even be given a realistic delivery date of 'by 2026', it is inevitable that the evidence base used to justify the original plan will be out of date.

Transport infrastructure schemes are generally assessed by looking at the costs and benefits over 60 years. There are a great many changes happening both nationally and globally that render the concept of a Park and Ride inappropriate, wasteful and unsound as a 60-year investment.

- In 2008, when the idea of an M32 Park and Ride on the current site was first put forwards, the price of oil touched \$40 a barrel. It now stands at \$103/barrel with a 1-year forecast of \$107/barrel despite the ongoing world recession. The factors that generated this rise are the rising cost of extraction; rising global population; and the growth of the Far Eastern economies. None of these factors will diminish; all will increase. In this context, long-term investment into car-based infrastructure is not appropriate.
- The Bristol Metro Rail project is now embedded into local policy and national rail policy. This will provide a huge increase in rail passenger numbers and generate a substantial modal shift away from car use. This project was not considered a realistic possibility at the time when the M32 P&R was first planned; it now offers a vastly better alternative investment for reducing urban car use. Planning for a P&R on this site sends out contradictory messages about the council's commitment to sustainable transport, car reduction and improvements in air quality.
- Climate change is already affecting food prices both globally and in the UK. The 2012 UK wheat harvest was exceptionally poor, as was the 2012 US corn harvest, both as a result of unexpected weather conditions. As climate change accelerates, high quality agricultural land adjacent to cities will become increasingly important for food security. The inherent value of the land safeguarded for the M32 P&R has not been quantified or even considered at any point in the planning process.
- The UK economy continues to struggle and public spending continues to be cut. There is currently no realistic prospect of an end to 'austerity', which many analysts believe is rooted in the continued dependence of the UK economy on ever-more expensive fossil fuels. In 2006, when the M32 P&R was first mooted, UK GDP was still rising. It peaked in 2007 and has not yet recovered to that level. In that ongoing economic context, a £15,500,000 investment into a scheme with very minor benefits is not a realistic prospect and should be dropped.
- **South Gloucestershire's Core Strategy** is currently approaching adoption. Within the SGC Core Strategy, sites are identified for 16760 new homes within the North and East Fringe of Bristol's Urban Area. In Bristol 900+ homes are also planned for sites adjacent to the Frome less than 1km from the proposed P&R site. This will generate substantial and unmanageable additional road traffic and a pressing need for public transport investment which will effectively reduce car use, in an economic context of funding cuts. It has been repeatedly demonstrated that Park and Ride generates only small reductions in city centre traffic (Atkins, 1998) some studies (Meek, 2007; Parkhurst, 2000) have shown that overall, Park and Ride sites actually result in an increase in car journeys. At the point when an M32 P&R was first suggested, the housing numbers for the North



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Bristol Fringes had yet to be established. Now that they are in place and it is clear that the area will have a hugely expanded population, a Park and Ride scheme that is likely to increase traffic in the area is unacceptable.

- The M32 Corridor is already an **AQMA** (Air Quality Management Area) up to the city boundary at Frenchay. Any increase of traffic into this area will increase congestion, not reduce it, and will increase pollutant concentrations. Given the likely increases in traffic caused by the massive development of new homes in the North Bristol Fringes, and the location of some of these homes (eg Harry Stoke New Neighbourhood) closely adjacent to the M32 corridor, any increase in traffic will have a negative effect on health, potentially manifesting in increased levels of heart disease, cancer and respiratory diseases. **Policy DM33: Pollution Control, Air Quality and Water Quality** states that mitigation rather than refusal as the only tool available to achieve the related aims of the Core Strategy (BCS23). During the 'Options' phase of Local Plan development the city council stated that "the purpose of mitigation is to effectively counteract unacceptable impact, and consequently there would be *no such impact once mitigation has been applied*" (our italics). There is no evidence that such a scheme of mitigation is even possible for the proposed M32 P&R should it ever happen.

5. Safeguarding of the M32 Park and Ride site is unjustified by the available evidence

The construction of a Park and Ride site at this location (and therefore the continued safeguarding of the land) would only be justified if it could be shown that:

1. The outcomes for the project have been properly defined.
2. The scheme has been realistically costed and a proper cost/benefit analysis has been carried out.
3. It represents the best possible use of that expenditure in achieving its stated outcomes.

We will demonstrate that none of these elements are in fact in place.

5.1 Outcomes

The outcomes for the M32 Park and Ride have never been clearly defined. The Greater Bristol Strategic Transport Study (Atkins, 2006) identifies the possibility of expansion of regional Park and Ride facilities, but does not offer any justification for such a move. Indeed, it is clear about the problems associated with park and ride, stating:

"With the introduction of park and ride, there is sometimes the danger that existing bus passengers are encouraged by the enhanced public transport journey to switch from a current direct bus journey onto park and ride. This would therefore: increase the level of car activity in the vicinity of the park and ride site; and potentially impair the viability of the existing bus services by the switching of passengers."

It goes on:

"It may be necessary to introduce remedial measures, such as ... provide revenue support for local bus services linking to the park and ride site"

The M32 Park and Ride then appears within the West of England Joint Local Transport Plan 3 (JLTP3). Again the individual outcomes for the project are not properly defined. As with the Atkins report, there appears to be a background assumption that Park and Ride are in themselves a good thing and should be expanded wherever possible. The assumption is presumably based on an intended outcome of reduced city centre car traffic. However, it is clear that Park and Ride sites are not especially effective in this regard. For example, within the North Fringe to Hengrove Value for Money Case, the X90 Hengrove Park - Cribbs Causeway bus is forecast to carry 3,000,000 passengers annually in 2016. This equate to around 8220 per day over 365 days a year. Compare this with the planned 1500 place M32 P&R site which would in all likelihood carry a maximum of 4-5000 people per day; it is clear that a single bus route can



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reduce city centre car traffic by more than double the amount possible by the M32 P&R. This is backed by the experience in Bath, where the X39 bus has been shown to transport more people into the city centre than all of the existing Park and Ride sites combined.

5.2 Costing

- The cost of the M32 P&R is stated in the Community Infrastructure Levy Funding Gap Background Paper (2/3/2012) and elsewhere as being £15,500,000. However, detailed justification for this figure is not readily available.
- In any assessment of the cost of a new Park and Ride, it should be borne in mind that Park and Rides require substantial ongoing subsidy. A study by Parkhurst (2000) showed that a subsidy was required of £1.72 per car intercepted (averaged across the 8 sites studied). This makes P&R an extremely expensive way of reducing city centre traffic and therefore not viable or deliverable for a council seeking to save money now and in the future.

http://www.konsult.leeds.ac.uk/private/level2/instruments/instrument035/l2_035c.htm

- No proper cost/benefit analysis has been carried out for the project. The allocated site is Grade 1 Agricultural Land, which has an inherent (and rising) value for food production. One of the costs of this scheme is therefore the opportunity cost of building on the land. Planning policy does not yet properly recognise or quantify this cost, but some work has been done on the matter by Joe Evans of CPRE Avonside. In his article 'The true value of agricultural land'

<http://www.bluefingeralliance.org.uk/articles/truevalueofland.htm> he writes:

"Bristol City Council's Core Strategy proposes the construction of a Park and Ride site on Grade 1 agricultural land at Stapleton, beside the M32. From documents published by BCC, this site would cover approximately 18 hectares of land, including the various approach roads and landscaping.

*Using the method outlined above, **the cost in lost food production of losing this grade 1 land could be taken as £162 million.** This opportunity cost would be added to the construction costs of the project, the loss of ecosystem services, the loss of biodiversity and the local cost in air pollution. That total could then be set against the economic advantages of the scheme."*

This approach is supported by the **National Planning Policy Framework**. The proposed P&R and its access roads are intended to be built on rare Grade 1 and 2 agricultural land which is currently being actively used for sustainable food growing activities in the form of established allotments and community food growing projects. The NPPF states *"Local planning authorities should take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development of agricultural land is demonstrated to be necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of higher quality"*. (NPPF 112)

5.3 Best possible use of expenditure?

The full ongoing cost of the M32 P&R is hard to calculate. However, the scheme can be considered in light of the alternative ways that the same budget could be spent in order to achieve the objective of reduced city centre traffic.

- One useful comparison would be with the Cycling City project. This had a total budget of £22.8 million; taking into account ongoing running costs for an M32 P&R, this is probably a broadly comparable budget. Over the project period (2007-10) the percentage of journeys to work made by bike in the city rose from 6.7% to 9.8%, representing around 7000 more people cycling to work every day. It is simply impossible for a 1500-space P&R to generate anything remotely approaching this level of modal shift, let alone to



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create the national profile, employment and social cohesion generated by the Cycling City project.

- It should also be noted that Park and Ride sites have been shown to generate a net increase in car traffic. In a study by Parkhurst (2000), all eight P&R sites studied resulted in an increase in traffic outside of the urban area; Parkhurst concludes, "*Urban-fringe bus-based park and ride provided with dedicated bus services is better described as a policy of car traffic redistribution than a policy of car traffic reduction... The net impact on traffic growth is to increase traffic on the road network overall for each case study by between 0.9 (Shrewsbury) to 20.7 (Norwich) car kms per intercepted car.*"

6. An ineffective means of reducing car traffic

The M32 P&R site is safeguarded within the document, presumably in order to help to deliver the Core Strategy's Spatial Vision and Objectives, which states

"In order to tackle congestion and pollution our overarching vision is for a less car dependent city and an emphasis on walking, cycling, buses, rapid transit and rail".

However, Park and Ride sites nationally have been shown to increase overall car traffic, which is in direct contravention to the stated policy objective.

- In Parkhurst (2000) it was concluded that:
"Results presented... suggested an increase in traffic outside of the urban area in all eight case studies as the result of intercepted drivers detouring to reach park and ride sites, passengers switching from existing public transport services and drivers making additional trips."
"The net impact on traffic growth is to increase traffic on the road network overall for each case study by between 0.9 (Shrewsbury) to 20.7 (Norwich) car kms per intercepted car."
*"Overall vehicle kilometres increased in every case but were redistributed onto less congested roads that in the short term at least is probably more efficient. However, any efficiency gains will be negated if freed road space fills up in the urban area. It is notable that there was a net increase even in the towns that have a long-term policy to reduce parking in the town centre. With projected increases in traffic levels, **the long-term effect may be simply to spread the congestion problem beyond the city boundary.**"* [Quotes from Leeds university Institute for Transport Studies]
- A subsequent study (Meek et al, 2010) suggested that Park and Ride could be effective in reducing traffic if Park and Ride sites were further from town centres. It stated:
"The Link and Ride concept uses multiple interchange sites located along corridors to intercept a large proportion of users early in their journeys... the Link and Ride concept ... was shown to offer significant VMT savings."
However, the current safeguarded site for the M32 P&R is actually substantially closer to Bristol city centre than the sites proposed earlier in the planning process (eg Atkins 2006). It is therefore a retrograde step in light of the evidence available, and can be expected to have a substantial negative impact on car traffic congestion. In particular, it can be expected to add to existing congestion at the M4/M32 junction and M32 J1, as well as along the A4174 on both sides of the M32.
- Part 6, Chapter 1, Section 110 of the Localism Act (2011) requires neighbouring local Authorities to cooperate ("*the Government thinks that local authorities and other public bodies should work together on planning issues in ways that reflect genuine shared interests and opportunities to make common cause. The duty requires local authorities and other public bodies to work together on planning issues*"). The evidence above suggests strongly that an M32 Park and Ride would create a slight fall in congestion in Bristol, alongside a more substantial increase in congestion in South Gloucestershire. This outcome is certainly not part of South Gloucestershire's transport policy, and it is



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hard to imagine that a Park and Ride site in the proposed location would be in the interests of South Gloucestershire in any way. Indeed, South Gloucestershire Council themselves are now understood to be questioning the need for an M32 Park & Ride, given plans to develop one at Emersons Green and make better use of existing, underused parking infrastructure at Parkway station.

Summary

The M32 Park and Ride is **unjustified, undeliverable** and would be **ineffective** at delivering the Core Strategy's Spatial Vision and Objectives. The inclusion of safeguarded land for the M32 P&R within the Sites Allocations and Development Management DPD is therefore **unsound**.

The reference to safeguarded land and access routes associated with the M32 Park and Ride should therefore be removed from the text and associated maps and plans within the Site Allocations and Development Management Policies document and subsequent Local Plan.

(continue on a separate sheet if necessary)

5. Please set out what change(s) you consider necessary to make the SA&DMP sound or legally compliant. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible.

Policy DM24: Transport Schemes - M32 Park and Ride site

Remove the reference to the M32 park and ride site in Policy DM24 and the designation of Safeguarded Park and Ride site from the Policy Map (map 15) and the Safeguarded Transport Link to the site from Stoke Lane.

Policy DM23: Transport Development Management.

2.23.1 and 2.23.2 Include "This is to be considered in the context of the Core Strategy



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aims of reducing car use and car reliance, improving sustainable forms of transport and improving air quality. Where a proposed development fails to contribute to the delivery of these aims it will be refused.“

2.23.4 Include “Car use minimisation measures including Transport Assessments and Travel Plans will be required for all planned housing developments across the plan area.”

Policy DM33: Pollution Control, Air Quality and Water Quality.

Air Quality: Remove the words “*or a financial contribution to offsite measures*” as this will undermine the responsibility of the applicant and the council to respond effectively to Potentially Polluting Development by, as stated, creating an *appropriate scheme of mitigation* or refusing development where this is inadequate or not forthcoming. This is vital to be able to control and manage the pollution, health, wellbeing and amenity impacts of any proposed development on its direct setting, local population and surroundings.

Ensure that the boundary of the Stapleton and Frome Valley Conservation area remains intact, as it was and where it overlaps with the Green Belt, and that such areas are subject to the appropriate protection, restrictions and care that this designation affords.

(continue on a separate sheet if necessary)

Please note your representation should cover succinctly all the information, evidence and supporting information necessary to support the representation and suggested change, as there will not normally be a subsequent opportunity to make further representations based on the original representation at publication stage. After this stage, further submissions will be only at the request of the Inspector, based on matters and issues they identify for examination.

6. If your representation is seeking a change do you consider it necessary to participate at the examination hearings?

No, I do not wish to participate in the examination hearings

Yes, I wish to participate in the examination hearings

7. If you wish to participate at the examination hearings please outline why you consider this to be necessary:

We would be happy to attend the examination hearings to elaborate on our representation and to hear the views of other participants on this issue if called by the Inspector.

(continue on a separate sheet if necessary)

Please note the Inspector will determine the most appropriate procedure to adopt to hear those who have indicated that they wish to participate at the examination hearings.



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8. Do you wish to be notified at the address/email stated in Part A of any of the following:

(1) that the Site Allocations and Development Management Policies have been submitted for independent examination

(2) the publication of the recommendation of any person appointed to carry out an independent examination of the Site Allocations and Development Management Policies

(3) the adoption of the Site Allocations and Development Management Policies

Signature:

KEVIN MORGAN *[Handwritten Signature]*

Date:

09/05/13