

**MetroBus: North Fringe to Hengrove package**  
**Planning Application Objection**  
**Author : Belinda Faulkes**

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**MetroBus: North Fringe to Hengrove package**  
**Planning Application Comment: Objection**  
**Author: Belinda Faulkes**

**OVERVIEW:**

The current design for the MetroBus North Fringe to Hengrove package (**NFHP**) is damaging to the environment, land and wildlife, local and wider community. This objection mainly focuses on the gravest aspect in the current scheme – the M32 bus only junction and road system in Stapleton. I am calling for this aspect of the scheme to be revised, redesigned and a different route / option found.

This current bus only road scheme is would involve a huge development on a very special and valuable area of land which would have many significantly adverse effects on not only on the environment, wildlife, and food growing land but also Bristol and South Gloucestershire residents and the local communities.

This is a long and detailed comment, but I ask the planning committee and planning team to read through this well researched and thorough document which contains much pertinent and relevant information which must be taken into consideration and responded to appropriately,

**IMPORTANT CONTEXT:**

As it is commented on in the planning application documentation –

***“A Park and Ride site along the M32 corridor is included in Bristol City Council’s Core Strategy, and the bus only junction is designed to potentially accommodate this in the future.”*** (Community Involvement statement P33)

This very clearly shows that the Park and Ride is really at the core of this bus only junction and road system. Despite the fact that this Planning application does not seek permission for the M32 Park and Ride – the bus only junction and road system, the contentious location and the Park & Ride are inextricably linked - and for this reason must be considered as a key part of this application.

There is currently no funding for the Park and Ride or evidence that it is the most evidenced or effective option available. ***Bus-based park and ride schemes were devised to reduce traffic congestion and pollution in towns, to make bus travel more attractive to motorists, to create space in town centres, to improve accessibility and to bolster economic development. However, schemes have been shown to generate new car trips, increase car mileage, abstract passengers from existing bus services (often rendering them unviable, to the detriment of those without cars) and increase overall car parking capacity. They may improve the appeal of the target town centre at the expense of other places. When sites become full there is a demand for more.*** (Park and Ride - its Role in Local Transport Policy - Graham Parkhurst, Briefing, 1998. CPRE Campaign)

Furthermore in this instance the site location at this site is not appropriate for many reasons – particularly if as the applicant states congestion at Junction 1 of the M32 is already an issue. However cars would have to come via Junction 1 to get to the over-bridge and into the park and ride so would add to rather than alleviate any congestion. It could encourage less parking at UWE, and more local traffic. Another main issue is that the proposed site for the Park & Ride is within the “Blue Finger” of Grade 1 agricultural soil, a valuable resource needed for food security and health of local people.

I ask that the Planning committee, Bristol City Council and South Gloucestershire council use their multiple skills and knowledge to develop a way to look at how a truly sustainable transport system can be designed implemented and worked towards so instead of damaging and having a seriously negative impact of this and other green spaces in Bristol & South Gloucester and work on ***“delivering a step change in public transport and the need to reduce the impacts of transport the environment.”*** (***Bristol Core Strategy***)

# **MAIN ISSUES ON POTENTIAL NEGATIVE IMPACTS OF CURRENT M32 BUS ONLY ROAD SYSTEM AND OVER-BRIDGE SITING AND DESIGN**

## **1.0 IMPACT ON LOCAL ENVIRONMENT AND LANDSCAPE**

The NPPF states that ***“Permission should be refused for development of poor design that fails to take the opportunities available for improving the character and quality of an area and the way it functions.”*** (NPPF 7.)Para 64)

The M32 bus only road system not only would damage the local environment and landscape but this application demonstrates no example of it improving the character or quality of the area and its functions (food growing// community engagement/ therapeutic destination – indeed it would seriously jeopardize these very functions and character.

The applicant states how

**11.6.52. Area B of the Scheme .....includes the proposal of a new bus only junction located on the M32 south of junction 1. The proximity of the new junction with the slip roads entering/exiting onto Stoke Lane means that there will be a direct impact on the local Stapleton and Frome Conservation Area, Stoke Park Grade II Registered Park and Garden and some Grade 3 agricultural land of allotments and small holdings meaning there could be an effect on the sensitivity of the area.”**

Assessment of Residual Effects and Significance during Construction and Operational Phases – Area B P39

( Please note that the applicant fails to state how some of the land & construction is on Grade 1,2 & 3a soil and the construction compound is placed in Grade 1 soil and the impact on the grade 1 soil growing being meters away from the road will have. Soil is discussed in further detail in points 2.0 & 2.1. )

The Visual Impact analysis states ***The new bus only junction compromises some mature vegetation and will detract visually from the existing character and physically affects local landscape designations....The open grassed areas and numerous trees and woodland blocks create a parkland character with a sense of place creating an attractive rural vista. ....*** NFHP MetroBus: Environmental Statement: Landscape and Visual Impact Assessment P32/

<p><b>Table 11.10: Summary of Effects on Landscape Resources – Area B</b> Site vegetation and land cover</p>	<p>Loss of scattered semi mature trees to incorporate localised carriageway widening along Coldharbour Lane</p> <p>Loss of amenity grassland to accommodate localised carriageway widening and bus stops.</p> <p>Loss of introduced shrub to accommodate localised carriageway widening and bus stops.</p> <p>Loss of Broadleaved Woodland, Plantation Woodland and Scrub.</p> <p>Loss of Semi-improved grassland</p> <p>Loss of a mosaic of arable, semi-improved grassland and Scrub within allotments and smallholdings.</p>
<p>Landscape Character</p>	<p>Removal of vegetation would open up the landscape and have an effect on the existing, well vegetated character of the highway corridor.</p> <p>During the construction phase site equipment, plant offices and other infrastructure would form further urban features in the landscape.</p> <p>During the operational phase new urban elements will dilute the semi-rural character along the M32 corridor and increase the number of urban style features.</p> <p>Slight increase in areas of hard surfacing and signage would have insignificant effects on the character of the area.</p>

The applicant states that adequate mitigation is the land recovering its former character & elements in 15 years time— I would argue that it is in no way adequate.

***“The impact of the Scheme on the landscape resource of the area in the initial years of operation will be moderate adverse as the reduction in vegetation along lengths of the Scheme will have a negative impact on the area and its biodiversity. After completion there would be a net increase of tree cover and a decrease in ‘soft’ landscape areas, although a proportion of the new grassland areas would be more diverse than the semi improved grassland areas that they replace. Initially these new landscape elements would be immature and therefore limited value in landscape character, biodiversity and habitat terms. However, as the landscape matures the value of the new landscape elements will increase and by year 15 will be comparable with the landscape elements and character that were lost.”*** NFHP MetroBus: Environmental Statement: Landscape and Visual Impact Assessment p 40.

The direct contravention of NPPF 7 is one example of this being a flawed design and application and must be rejected so that it can be revised and redesigned so as to omit this damaging (Park & Ride orientated) road system.

## **1.1 INADEQUATE ASSESSMENT & NEGATIVE IMPACT ON FOOD GROWING LAND, LOCAL COMMUNITY PROJECTS, LANDSCAPE AND PEOPLE**

The Environmental Impact Assessment tool which should have been used in designing this road proposal states that the Assessment should contain

***“A prediction of the potential impacts on the existing human, physical and natural environment at the site and assessment of subsequent effects;”***

The road system is designed to cut across a piece of land which is currently the location of Feed Bristol, Sims Hill Community Agricultural initiative & Stapleton Allotments. The Planning application documentation contain no assessment of or even reference to the highly probable potential impact of the road system on this valuable food growing land and associated food growing & wildlife projects and the thousands of people who benefit from them. The design of the road system as it stands will detract from and have a seriously negative impact on the local area and its character and qualities and function of community engagement in food growing and wildlife conservation.

## **1.2 NEGATIVE IMPACT ON FEED BRISTOL PROJECT AND LOCAL COMMUNITY:**

The construction of the bus only road system in the current design slices through the small holdings 1-3 which are currently leased to Bristol’s most renowned and successful Community engagement, food growing and wildlife engagement project – Feed Bristol, managed by the Avon Wildlife Trust.

Feed Bristol is highly successful and renowned it has been used by Bristol city Council twice as a beacon example of successful and sustainable Urban Food Growing project as part of URBACT. The project has won the following awards:

- ☒ Bristol Council Community Neighbourhood Award
- ☒ Oxfam - Community Award
- ☒ Bristol Green Volunteers Award - For having in excess of 2000 volunteers hours
- ☒ Local Food grant Awards - Community Growing Project Award (top out of 500 national projects)

Feed Bristol has been a highly successful in community engagement with a wide range of community groups. The diverse qualities of this land have been part of the success of Feed Bristol and its popularity with local people. This land and project is a valuable community resource which has touched the minds, hearts and lives of thousands of Bristol residents. The current bus only road design has the huge potential to devastate what is a beautiful, calm, green and fertile piece of land rich in wildlife habitat - mature hedgerow & trees, incredibly fertile agricultural land, as well as impact on the valuable social and community led work. A large focus of Feed Bristol's work is engaging people from the local community who are disadvantaged in some way.

The lease of the land what is currently Feed Bristol project belonging to Bristol City Council - for most of the planned road system on - ends next year. However the rest of the projects land adjacent to this has a much longer term lease. The huge potential for pollution & destruction of high grade fertile and food growing is very serious. The highest impact of this development could be during the construction period, where dust, pollution from construction vehicles, noise and contamination would not make this haven and hive of activity a thoroughly unpleasant, unhappy and unhealthy place to be. The road design also encroaches onto land that has been longer leased and

Feed Bristol has developed and flourished with the previous support of Bristol City council, Bristol Green Capital (with a £10,000 grant) and initial funding by the Local Food Grants (Big Lottery). Feed Bristol is at a crucial time in its development, currently seeking further funding and the start of commercial enterprises to enable a long term and sustainable existence. The road and junction development is predicted by Avon Wildlife Trust to have a serious impact on the financial success of the project potentially deterring funders and participants and crucial financial input. This is highlighted by Avon Wildlife Trust in their Planning Application comment.

The total or partial loss of this project would be a serious loss for Bristol and South Gloucestershire residents and this can not be allowed to happen- particularly when there are other alternatives to this particular aspect of the scheme

### **1.3 EVIDENCE OF FEED BRISTOL ACHIEVEMENT- WHAT IS AT RISK**

In their objection statement for this application ***“Avon Wildlife Trust (AWT) objects to this Scheme in principle given its negative impacts upon the wider area in terms of loss of nature conservation value, public amenity and landscape benefits, as well as its current and potential value for sustainable food production. Specifically, AWT is concerned at the Scheme's significant impacts upon the environment and economic viability of our Feed Bristol wildlife-friendly community food growing project which operates out of the 1-3 Stapleton Smallholdings site.*”**

On **following pages** is a report on Feed Bristol which shows the Objectives and achievements made by Feed Bristol over the last 2 years.

## Feed Bristol Objectives and Targets Report: Matt Cracknell Project Manager 2014

Since Feed Bristol started in March 2012 until March 2014:

People & benefits: In total: 23,153 people have benefited from the project in some way.

Objectives and achievements breakdown:

Objective 1: Engage a range of people with different needs to take part in wildlife gardening

	Cumulative total
A) Disadvantaged and marginalised people supported	5,713
B) School kids engaged	4,472
C) People engaged in wildlife gardening activities	9680
D) Additional people engaged directly through external events	3,288
Total	23,153

A) Disadvantaged groups engaged (break down)	Cumulative total
Community groups	731
Mental health	304
Learning difficulties	1,027
Disadvantaged (unemployed/probation)	1,671
Youth groups	722
Elderly	1,148
BEM 100 (includes refugees x 50)	110
Total disadvantaged people supported	5,713

B) Schools breakdown	Cumulative total
Work in schools ( from 20 Schools)	2,072
School kids on site	2,400
Total school kids engaged	4,472

C) Communal growing and engagement activities on site	Cumulative total
Regular volunteers (grow leaders)	45
Individual sessions/activities	2,813
Time and Land poor participants	768
People engaged through veg deliveries + drop ins	1,316
People attending weekend workshops and events	4,738
Total engaged in wildlife gardening activities	9680

Objective 2

Support people to grow in a wildlife friendly way.

	Actual
Grow Leaders	45
Volunteers, mini plotters, communal growers	453
Total	498

Training sessions delivered	190
	453

	<b>Days</b>	
<b>Volunteer hours to date:</b>		<b>3142</b>
<b>Community activity hours</b>		<b>2776</b>
<b>Corporate group hours</b>		<b>1011</b>
<b>Total</b>		<b>6929</b>

### **Objective 3**

**Change Bristol's local food culture by inspiring and reaching 61,500 through events, campaigns and media**

**School food growing campaign & Work with 80 schools**

**Community food growing campaign**

**Reaching all school kids** **16000**

**Community groups** **110**

**4 Events at Feed Bristol per year** **23**

**People externally reached through events** **3288**

**D) Events on site reaching** **4738**

**Total reached through events** **8026**

### **Objective 4**

**Build community cohesion and reduce deprivation through providing fresh food**

Number of people that have directly benefited from the project	Achieved
	23153



## 1.4 Feed Bristol – road location

I would like to request that the Planning committee visit the planned road system site. Here are some examples of the project and the proposed road site.



Road site and entrance along tree-line in background, would impact on Feed Bristol fruit tree nursery and forest garden, mature trees and hedgerow and be next to main example bed food growing area



Idyllic woodland glade – the road proposed site would cut through this copse, currently marked out at the back of the picture. The trees in the background would be felled as well as other mature trees in this woodland



The proposed designated road site is currently a wildflower meadow/ grasslands (in background). It is metres from the newly built round house and food growing land, This meadow would be turned into allotments and have a road and bus stops on it.

## **1.5 JEOPARDISING A COMMUNITY SERVICE & FACILITY: EDUCATION, ENGAGEMENT & THERAPEUTIC DESTINATION**

***NPPF states that Planning should Promote Healthy Communities –***

***70. To deliver the social, recreational and cultural facilities and services the Community needs, planning policies and decisions should:***

- plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;***
- guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs;***
- ensure that established shops, facilities and services are able to develop and modernise in a way that is sustainable, and retained for the benefit of the community...***

The road system aspect of the design is not in line with the above NPPF points as it will jeopardise and potentially have a seriously negative impact on the work carried out on Feed Bristol, particularly over the construction period (2-3 years) as well as Stapleton allotments and Sims Hill CSA and the valuable services they offer to the community.

The core work of Feed Bristol is focused on community engagement in wildlife friendly food growing. It works on the guidelines of environmental stewardship of the land as well as the learning and development of the project participant's. It has a distinctly therapeutic aspect to the work carried out and attracts many people with complex needs and disadvantaged backgrounds as well as a diverse range of people.

The project as a therapeutic destination would be in serious jeopardy if the road development goes ahead – the works slice through the side and top of the project. The pollution, noise, and traffic would without a doubt shatter this most pleasant, tranquil and healthy environment. The visual impact would also be disturbing – the only mention of this in the Landscape Visual Assessment is in regard to agricultural land being a huge part of the visual character of the area and impact on Parkland character and attractive rural vistas.

Bristol's site allocations Policy DM5: Protection of Community Facilities  
States that

**Proposals involving the loss of community facilities land or buildings will not be permitted unless it is demonstrated that:**

**18**

- i. The loss of the specific existing community use would not create, or add to, a shortfall in the provision or quality of such uses within the locality, and or, where the use has ceased, that there is no need or demand from for any other suitable community facility that is willing or able to make use of the building(s) or site land; or**
- ii. The building or site land is no longer suitable to accommodate the current community use and cannot be retained or sensitively adapted to accommodate other community facilities; or**
- iii. The community facility can be fully retained, enhanced or reinstated as part of any redevelopment of the building or site land; or**
- iv. Appropriate replacement community facilities are provided in a suitable alternative location.**

**2.5.2 Community facilities include all uses, commercial or non-commercial, that provide a social or welfare benefit to the community.**

Key types of community facility are set out in Core Strategy policy BCS12. Whilst protection is sought for all uses that meet this definition, community land and buildings are particularly important. This includes land and buildings that are managed, occupied or used primarily by the voluntary and community sector for community-led activities for community benefit.

As the Landscape Visual Assessment comments;

***As the Construction phase activities will have a negative impact on the landscape character of the area and by their very nature are difficult to mitigate against. The works will appear as a major detracting feature. It is considered that the landscape resource effects would be moderately adverse, but it is noted that the effects would be temporary and short term.***

Please note that the applicant also states that it will take 15 years for full recovery but landscaping and mitigation planting. However the impact a road and bus stops in what was tree lined, woodland copse, fields and food growing land is not addressed. As addressed in a previous section the impact on the community facilities and community members is not mentioned in this application.

## **1.6 POTENTIAL HEALTH IMPACTS:**

The current design undermines local 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. This policy ensures the impact on health is taken into account from the outset in considering proposals and requires systematic health impact assessments to be undertaken for larger proposals. '.*** (2.14.1)

A huge road system on this site would both damage valuable, high grade agricultural land that is required for a resilient local food system. It would also severely impact successful food growing projects 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.

The potential for Feed Bristol to have a positive impact on members of the community – including large numbers of people who come from disadvantaged backgrounds and attend the project as part of a health and therapy programme would be seriously put at risk by the construction of this road system. As highlighted by Avon Wildlife Trust in their objection statement.

***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. (AWT)***

In Sustains report: ***The benefits of Gardening and food growing for health & wellbeing.*** (April 2014) they highlight the following findings

***Community food growing and local organic food production is proven to promote and deliver many health benefits including:***

- Physical Health and wellbeing including greater consumption of nutrient rich food, strengthening body systems.***
- Mental Health & wellbeing***
- Physical exercise, reduced obesity, healthy weight management & healthy eating***
- Social & therapeutic benefits & coping with serious health problems.***
- Reduced reliance on medication***
- improved attitudes towards health and nutrition in young people***
- reduced stress, anxiety, dementia, self harm and depression***

In regard to the health benefits of gardening that this development would lead to loss of leave it also not in line with: *Bristol Local Plan 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'.*

It also goes against National strategy- *'Healthy lives, healthy people White Paper: Our strategy for public health in England, 2010'* which looks at ways to:

- ***Improve the health of the poorest / Reduce inequalities in health***
- ***Promote healthy behaviours & lifestyles/ Adapt the environment to make healthy choices easier***
- ***Protect green spaces***
- ***Improve access to land so that people can grow their own food***
- ***Provide protection from preventable ill-health***

The road system is not in line with these recommendations as it would be putting at serious risk projects which are directly engaged in these activities and have been for 2 years WITHOUT this MetroBus road system. This road system would also be damaging and changing Green Spaces so they would not be so productive, environmentally, economically or socially.

Any road proposal needs to have to have systematic health impact assessments that relate to the loss of health benefits which are felt by such community food growing projects and will be placed in severe jeopardy unless the this section of the scheme is removed.

The applicants Health Assessment also notes the potential Health Impacts on the following aspects –

#### ***Determinant & explanation***

##### ***Access to green space & land blight***

***Access to good-quality and well maintained urban green spaces promote physical activity, positive mental wellbeing and healthy childhood development.4 Studies5 have shown that exposure to the natural environment, or green space, has an independent effect on health and health-related behaviours.***

##### ***Pathways***

***Transport schemes may lead to disruption of the normal uses of, reduced access to and potential loss of green space. This can reduce the use of greenspace and have a negative aesthetic impact on the use and perception of the greenspace.***

##### ***Health outcomes***

***Green space can affect health by inducing beneficial physical activity, and by ameliorating the response to stress. Reducing or disrupting access to green space may therefore have health consequences. The fear of land being blighted by the proposals may lead to an increase in stress and affect wellbeing.***

*Planning Application MetroBus Hengrove to City Package Health Assessment Page 15*

The planning application documentation then fails to address these issues further and nor are they reflected in the design of this part of the scheme, neither the many other parts which damage green spaces in Bristol (See Map 1 on the following page) These points are all highly relevant to this objection and support the case for the bus only road system section of the application as it stands to be rejected on these and the multitude of other issues within this and other objections

## 1.7 DAMAGE TO REGENERATION OF COMMUNITY HERITAGE ASSET

**Bristol Planning Policy DM31 (backed up by BCS22) requires heritage assets are looked after, valued, conserved and enhanced for the benefit of past, present and future generations. The proposed road system in the application contravenes this policy.**

Since it's founding in 2012 the project Feed Bristol has regenerated this piece of land, which is also part of the local communities' history and heritage as market gardens and food growing land. This land at one point was part of the Beaufort estate food growing land. This whole area used to be farming area, something which we have the potential to reinstate and regenerate further. Stoke Park a protected grade 2 heritage area will also be seriously impacted on, particularly visually.

## 1.9 NEGATIVE IMPACTS ON LOCAL COMMUNITY COHESION AND WELLBEING

The application and this road system proposal would have such an impact on Feed Bristol, Sims Hill CSA and Stapleton Allotment that it goes against – **NPPF 8: Promoting Healthy Communities**

***Para. 69 states “creating opportunities for meetings between members of the community who might not otherwise come into contact with each other...involve all sections of the community in the development of Local Plans and in planning decisions, and should facilitate neighbourhood planning”.***

***- Para. 70 states that “Planning should Promote Healthy Communities – by protecting the local community facilities.”***

*Bristol's Core Strategy is also not followed – in its points of:*

***“Regeneration in North and East Bristol***

- Opportunities for community based regeneration projects will be progressed across the Northern Arc area.***
  - The employment, income, education and skills deprivation faced in these areas will be reduced.”***
- Bristol CS p.20***

**South Gloucester core strategy 2013 P21 Managing the Environment and Heritage**

- **Conserving and enhancing the character and distinctiveness of the**
- **district's heritage assets and maximising their contribution to quality of**
- **place and the wider benefit of the district**
- **Conserving and enhancing the district's distinctive landscapes, natural**
- **environmental resources and biodiversity**
- **Safeguarding mineral resources for the longer term while ensuring an**
- **adequate and steady supply to meet identified needs**
- **Safeguarding the quality of natural resources and ensuring prudent use**

The land impacted upon by this road system hosts Community Supported Agriculture, volunteer-led community gardening and food growing at Feed Bristol and structured training and education opportunities in horticulture and other areas. These opportunities and facilities will be seriously impacted upon or even lost if the area is developed.

The application to develop on this green space and land does not take into account the local opposition to this planning policy nor the wishes of Bristol residents and is therefore unsound.



***A survey of inner city Bristol (IRIS, 1999) found that people wanted more natural spaces and valued contact with nature***

***A study to inform the Parks and Green Space Strategy (BCC, 2008) revealed that natural green space is the most highly valued type of open space (Bristol Biodiversity Action Plan)***

-The impact of this development would be in direct conflict with Bristol Core Strategy which states the aim of ***Protecting and enhancing the natural environment and ensuring best use is made of open spaces to meet the needs of residents and employees in the city. Bristol Core Strategy P132.0***

## **1.9 JEPORDISING FOOD PRODUCTION**

Feed Bristol grows food which is shared by volunteers, workers and other participants. It also works in partnership with a community supported agricultural initiative Sims Hill who grow a large proportion of their produce on the site & in the green houses as well as their own land on Sims Hill.

### **FACTS:**

Feed Bristol Feeds at least 50 household per week, provides nutritious meals at monthly community events and has plans to expand its production even further growing in partnership with Sims Hill. It also trains volunteers, holds courses in horticulture and other horticultural and land based topics.

**Sims Hill CSA** grows for 80 households - Rising to 100-110 Households in July and 160 when at full capacity growing at Sims Hill and Feed Bristol.

Sims have 3 employees and offer 10 work shares. They also have 10 communities weekend workdays a year and have undertaken approximately 55 days of training this year offering the opportunity for people to gain experience and knowledge in food growing. The proposed path to the bus stop from Frenchay Park Road would be based along side the land which they cultivate and the huge compound as seen in drawing "Proposed Compound area route plan" behind it.

On site food growing would be in serious jeopardy with the road being built – particular from local pollution e.g. dust, emissions and water pollutions from the development site onto land / produce and people using the site. The majority of work done on the site is carried out by volunteers, many of whom come to Feed Bristol and Sims Hill because of its tranquillity, wildlife and healthy and pleasant working conditions. Building a road through this would shatter this positive environment and the number of people contributing to the food growing.

The New Bristol Local Plan (2014) contains a new Food Systems paragraph ***2.13.6 which states the City's support for the Bristol Good Food Plan and for importance of creating a resilient local food system.***

The Bristol Good Food Plan by The Local Food Policy Council says the **'Safeguarding of land for Food Growing' is essential part of a strong food system. Yet it does not protect our best soil. Relevant policies need to be developed and strengthened.**

West of England Duty to Co-operate schedule:

The West of England Partnership has agreed to co-operate in looking at Food Systems **'To protect and enhance the resilience of the food system' (P.14/15)**. The current scheme shows that this commitment has been neglected. I have found no evidence of any meetings or communication relevant to or regarding the Food Systems issues. Thus the West of England Partnership as applicant is in contravention of its own agreement.

## 2.0 IMPACT ON VALUABLE SOIL

The land at this proposed development site is highly fertile soil including Best & Most Versatile (BMV) Soil (Grade 1-3a) which is covered in National Planning Policy

**National Planning Policy 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 authorities should seek to use areas of poorer quality land in preference to that of higher quality". (NPPF para 112, pp. 24)**

There is no evidence of any sequential choice of land for this road system and associated construction compound.

The applicant does not give clear and consistent statements on BMV (Best and Most Versatile Soil) loss, as well as negating the Classification in official maps. In Planning Statement p26 it states that

**Soils: The loss of land 5.28ha BMV agricultural land will have and permanent and significant moderate adverse effect at a local level. (16.15)**

The applicant states in the Land Use and Soils document that

**The Provisional Agricultural Land Classification (ALC) map11 shows the allotment area to be Grade 1, but a soil survey of this land showed found it to be too heavy for Grade 1 and it is in Grades 3a and 2 (Appendix 16.3). Grades 2 and 3a are within the Best and Most Versatile (BMV) land category. BMV land is afforded protection by the NPPF. A soil survey of the site can be found in Appendix 16.3)**

**Smallholdings 5, 5A and 6 are required temporarily for a construction compound. The soils of 5A and 6 adjacent to Frenchay Park Road are developed in soft Redcliffe Sandstone and are sandy silt loam in texture passing to sandy loam at depth. Such freely drained, light soil, and are in Grade 1. The remainder of this land is in Grades 2 and 3A.**

The applicant then states the contrary in Appendix 16.3

**Southern part of smallholdings 1-3 (Feed Bristol's horticultural land) and 5A and 6: Here, the soils are quite different from land further north. The soils are developed in soft Redcliffe Sandstone and are sandy silt loam in texture passing to sandy loam at depth. Such freely drained, light soils, supplied as they are with ample water for irrigation, and are in Grade 1. None of this land is affected by the Scheme.**

The applicant then state how this Grade 1 soil will indeed to impacted upon, and disregards this as not significant

**The land under the construction compound (plots 5, 5A and 6) is likely to become compacted and deep loosening may be required to restore soil structure and permeability, which effects of which are addressed through the CoCP and therefore assessed as neutral and not significant.**

After such damage this soil cannot just be "repaired"

This soil would be polluted, (by so many vehicles etc), compacted and damaged after use, with significantly reduced fertility and its structure. (This cannot be rectified or repaired just by “loosening” as the applicant states in the Land Use and Soils report. The proposed M32 Park and Ride which is central to this road system is currently sited on this Grade 1 soil and land further up, this road system could facilitate the M32 development with dire consequences for the soil and it’s services and potential productivity. I question whether this “compound” is only a construction compound or indeed the beginnings of the M32 Park & Ride and a way to begin the development – without actually having the funds of permission specifically for this as it falls in the allocated land in the SADMP.

The classification criteria set out by DEFRA in the Town and Country Planning (Development Management Procedure) points to the bus only road system as having a small impact on the loss of land due to the size of the land impacted. **However** The impact of the scheme would be likely to render a commercial farming activity (of Feed Bristol & Sims Hill CSA) non-viable - thus this effect could be Majorly adverse

## 2.1 SOIL PROTECTION

In the EU **Thematic Strategy for Soil Protection** - Directive and Communication From The Commission To The Council, The European Parliament, The European Economic And Social Committee And The Committee Of The Regions states

***There was unanimous consensus that soil shall be guaranteed the same level of protection as provided to other environmental media, such as air or water, because soil functions are crucial for human and ecosystem survival. Thematic Strategy for Soil Protection Directive Para 225***

***Soil is under increasing environmental pressure across the Community, driven or exacerbated by human activity, such as inappropriate agricultural and forestry practices, industrial activities, tourism or urban development. These activities are damaging the capacity of soil to continue to perform in full its broad variety of crucial functions. Soil is a resource of common interest to the Community, although mainly private owned, and failure to protect it will undermine sustainability and long term competitiveness in Europe. Moreover, soil degradation has strong impacts on other areas of common interest to the Community, such as water, human health, climate change, nature and biodiversity protection, and food safety. Thematic Strategy for Soil Protection Directive Para 120***

***Soil degradation is a serious problem in Europe. It is driven or exacerbated by human activity such as inadequate agricultural and forestry practices, industrial activities, tourism, urban and industrial sprawl and construction works. These activities have a negative impact, preventing the soil from performing its broad range of functions and services to humans and ecosystems. This results in loss of soil fertility, carbon and biodiversity, lower water-retention capacity, disruption of gas and nutrient cycles and reduced degradation of contaminants.***

***Soil degradation has a direct impact on water and air quality, biodiversity and climate change. It can also impair the health of European citizens and threaten food and feed safety.***

Thematic Strategy for Soil Protection Communication Para 2.1.

- Natural Environment White Paper: The Natural Choice: securing the value of nature (June 2011), states that

***We want the planning system to contribute to our objective of no net loss of biodiversity; to encourage local authorities to promote multi-functional development so that we get the most from land; and to protect our best and most versatile agricultural land. (paragraph 2.35).***

The latest Planning Practice Guidance (PPG), which requires planners to support people to make healthy choices, includes promoting access to healthier food which should be taken into account (***the Rise of Community Food Growing: What Role for Local Planning Authorities? Local Government Information Unit Policy Briefing 14.4. 2014***).



In addition, the PPG states that, **"soil is an essential finite resource that provides important 'ecosystem services', for example as a growing medium for food, timber and other crops, as a store for carbon and water, as a reservoir of biodiversity and as a buffer against pollution"**.

The Application's Environmental Statement (ES) Chapter 4, para 4.3.2 states that the development of the best and most versatile (BMV) category of agricultural land for non-agricultural uses should only be considered acceptable where there is demonstrable economic and other benefits and/or the land loss is slight (less than 20ha). Chapter 16: Land Use and Soils identifies that the Scheme will result in the slight loss of some areas of BMV agricultural land at Stapleton Allotments and land between the A4174 and M4. However, there is no reference in the NPPF or the guidance to the amount of BMV lost which is acceptable in planning terms and therefore this policy objective is not met.

- First Soil Action Plan for England DEFRA **2004 -2006, 2004b** – exerts best ways to protect soil through regulation & policies.

***Soil is a fundamental and irreplaceable natural resource, providing the essential link between the components that makeup our environment. The sustainable management of soils is a central pillar in sustainable development"***.

Therefore this application is in contravention of this sustainability development objective and thus also goes against the "golden thread" of sustainable development exhorted by the NPPF framework and **"the presumption in favour of sustainable development"**.

## **2.2 POTENTIAL IMPACT OF LOCAL POLLUTION**

It is important to note that in the Planning application report comments on the potential of local pollution which would seriously impact on food growing, Feed Bristol, Sims Hill CSA and Stapleton allotments as well as the health and wellbeing of its participants and workers

### **Determinant & explanation**

#### **Soil and water pollution**

Surface run-off containing particles from car tyres, brake linings & road surfaces contribute to the spread of hazardous substances in the environment and impact on water and soil quality. Oil and vehicle fuel also contain harmful organic substances.

**Pathways** Potential for localised contamination can occur during the construction period from construction spills and road run-off. Land use, e.g. when building a road, can bring about changes in groundwater levels and pollute nearby water bodies.

**Health outcomes** Soil and water pollution can lead to public health impacts directly when people come in contact with water and soil through recreation activities and or indirectly through the use of water for gardens and allotments watering.

*Planning Application MetroBus Hengrove to City Package **Health Assessment Page 15***

## **2.3 IMPACT ON CLIMATE CHANGE, SUSTAINABILITY AND FOOD SECURITY**

The need to take action to build on the relationship between resilience to climate change, sustainability and food security this is well highlighted in Sustainable Development Commission on 2002 Policy Commission review, UK Farming and Food.

***"There is an excellent acknowledgement of the importance of food security right at the start (of the Policy Commission report): 'but land and expertise remain available if greater quantities of home-produced food are suddenly needed'. But beyond this there is almost no mention of the need for resilience to potential risks from climate change, global resource (e.g. oil) disruption, transport breakdowns etc. Increases in local sourcing and distinctiveness are seen as cultural benefits;***

***shorter supply chains as a way to cut costs. None of them are recognised as prudent ways to increase security through diversity.”***

I ask the planning committee and involved parties to reflect on the impact of this development (including a gateway for a Park & Ride which would destroy further soil, eco-systems, wildlife habitat and food growing land) which could have serious consequences for the future residents of Bristol to look at the wider picture of climate change, the value of fertile soil and the need to protect and use them for local food security.

As a city and peri – rural area the areas need to be able to produce food for its population is not a simple one. An informed and well justified decision could be made which takes into account the fact that without local food, a sustainable future is highly uncertain.

As well as Climate change, strengthening and building resilience into the environment, wildlife conservation, local economies and communities; a serious consideration must also be Peak Oil. In ***A peak Oil Report, Building a positive future for Bristol after Peak Oil***, ‘***commissioned by Bristol City Council and the Green Capital Momentum Group Food policy, actions and measures which would prepare Bristol for peak oil*** were highlighted as being

***:4.5.1 Key elements of a sustainable food system for Bristol***

- ***Policy ensuring greater food security and affordability in Bristol***
- ***More local production and consumption of those foods which can be grown in the local region***
- ***Protection of local agricultural land for farming***
- ***Increased access to growing spaces for people to be able to grow some of their own food***

## **2.4 ENVIRONMENTAL STEWARDSHIP AND ECOSYSTEM SERVICES**

The current design and road development does not take into account Bristol’s beacon example of the highly regarded and valuable “environmental stewardship” work being done on this land by Feed Bristol & Sims Hill CSA and does not take into account the many benefits this bring

A new report commissioned by Natural England, ***Ecosystem services from Environmental Stewardship that benefit agricultural production, assesses the role of Environmental Stewardship in protecting the environment and agricultural food production.***

The government states in its press release on the response to the paper that

***“The natural environment underpins our economic prosperity, health and wellbeing. The aim of the White Paper is to set out a clear framework for protecting and enhancing the things that nature gives us for free, which are too often taken for granted.”***

The report found that Environmental Stewardship schemes – which provide funding to farmers and other land managers in England to deliver effective environmental management on their land – are delivering a range of vital goods and services, known as ecosystem services – which benefit the natural environment and in doing so help sustain and develop agricultural productivity.

Ecosystem services are defined as the benefits society gets from the natural environment, including cultural services such as the conservation of biodiversity and people’s enjoyment of the countryside, regulating services, such as flood protection, clean air and water and provisioning services such as the production of food, timber and other resources.

The Natural Environment White Paper identified **the need to increase food production whilst protecting, enhancing and linking biodiversity and landscapes.** This research was commissioned from the Food and Environment Research Agency (Fera)

The above quoted research found many examples of how ecosystem services supported by Environmental Stewardship contribute to food production.

Ian Fugler, Land Management Director for Natural England, described the importance of Environmental Stewardship to food security and the environment:

***“Long-term food security and a healthy natural environment are inextricably linked. This report highlights how Environmental Stewardship supports the important role farmers play both in putting food on the table and providing a whole range of vital goods and services – protecting wildlife, managing water, storing carbon, looking after woodlands and hedgerows, and planting new ones, and shaping much-loved landscapes for people to explore and enjoy”.***

Developing on this land which would severely affect the work being done to develop practices and teach people about Environmental stewardship. This in turn would destroy the benefits

### **3.0 SERIOUS IMPACT ON CONSERVATION AREA, BIODIVERSITY, WILDLIFE, ECOLOGY-**

The Bristol Core Strategy states that

***The Bristol Biodiversity Action Plan will be used to guide decisions on protection, enhancement and provision of additional green infrastructure relating to biological and geological conservation. Where relevant the Avon Biodiversity Action Plan and Strategic Nature Areas identified at the regional level, will also guide these decisions.***

***A survey of inner city Bristol (IRIS, 1999) found that people wanted more natural spaces and valued contact with nature***

***| A study to inform the Parks and Green Space Strategy (BCC, 2008) revealed that natural green space is the most highly valued type of open space***

*The Bristol Biodiversity Action Plan demonstrates complete and direct approach and guidance to protecting biodiversity, there is no evidence within the road only junction that this has been used for a guide for design decisions.*

The Council's own communication on Conservation Areas states that, ***“it is the overall character of the area, and not individual buildings, that policies and legislation relating to Conservation Areas seek to protect. Although high quality townscape can be a contributing factor, the special interest of Conservation Areas can come from: historic road patterns, plots and boundaries; characteristic building materials or construction techniques; building uses; green spaces; trees and street furniture; or distinctive views”.*** (Conservation Areas: Frequently Asked Questions)

The Council has agreed to take care to ensure the character and special interest of that area is protected and enhanced and it is a material consideration in the judgment of this planning application.

The Council states that it ***“will require new building work to preserve or enhance the existing character or appearance of the Conservation Area”.***

South Gloucestershire Local Plan Policies:

**L1: Landscape protection and enhancement:**

***This policy seeks to protect and enhance the character, distinctiveness and amenity value of local landscapes. According to the policy, development will only be permitted which protects and, where possible, enhances landscape, distinctive character and amenity of the locality. Within this area, the Scheme passes through and by a number of designated landscape features including Stapleton and Frome Vale Conservation Area and Savages Wood ancient woodland;***

**Policy L12: Conservation Areas: Policy L12 states that development within or affecting a conservation area will only be permitted where it would preserve or enhance the character or appearance of the conservation area. The South Gloucestershire section of the route passes through the Stapleton and Frome Vale Conservation Area;**

M32 Bus only junction would seriously impact on the Stapleton and Frome Valley Conservation Area. The development proposed is damaging and negative not enhancing in any way therefore the planned development contradicts the Bristol & South Glouc. Council's policy.

The NPPF 11- para 109 Conserving and enhancing the natural environment states that

***The planning system should contribute to and enhance the natural and local environment by: protecting and enhancing valued landscapes, geological conservation interests and soils; recognising the wider benefits of ecosystem services;***

***minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;***

**South Gloucestershire Local Plan point 5. Responding to Climate Change and High Quality Design also states that it will work towards**

- ***Protecting and enhancing valued open spaces and green links to create a network of connected and multi-functional, attractive and accessible spaces for people and wildlife, and to provide climate change adaptation and mitigation functions***
- ***Providing opportunities for flora and fauna to adapt to climate change***

The current road design if developed would have severe impacts on the biodiversity, landscape and jeopardise the ecosystem services, valued environmental present and future benefits provided by the this land, the project Feed Bristol, Stapleton allotments and surrounding areas

### **3.1 POTENTIAL ADVERSE IMPACT AND DESTRUCTION OF WILDLIFE NETWORK SITES AND WILDLIFE CORRIDORS**

**Wildlife Network Sites** are defined in the Core Strategy BCS9 as  
***:"...land with a function as a corridor for wildlife, and along with the locally designated Sites of Nature Conservation Interest, form the Bristol Wildlife Network. The Network either links the designated local sites to each other or to the wider countryside. "***

The Site Allocations and Development Management Policies DPD (SADMP) Para 2.15.13 states that  
***'when the correct species are provided, a strong framework of street trees or linear connections can assist in creating or strengthening existing wildlife corridors. Where a development site is on or adjacent to part of the Bristol Wildlife Network, the design and placement of any trees should enhance or create wildlife corridors between known habitats.***

Para 2.19.21 further states that ***'Development should integrate existing wildlife corridors. Where this is not practicable it should provide suitable mitigation in the form of on-site, functional Wildlife Corridor(s). Development should also provide mitigation for any habitats, species or features of value associated with the Wildlife Corridors, where they are harmed or lost. This should take place on the development site wherever possible. Where it is not possible to replace Wildlife Corridors, or their associated habitats, species and features of value within a development site, consideration of off-site mitigation to recreate a wildlife corridor in the nearest section of the Bristol Wildlife Network will be appropriate, provided the overall connectivity of the Bristol Wildlife Network is not***

***harmed. Planning obligations may be utilised to secure off-site mitigation for habitats, species and features replacement, and to create or enhance new***

As this land in question (Feed Bristol / Stapleton Allotments) is part of a wildlife corridor – (discussed below) this development would seriously affect the connectivity of this part of the network.

### **WILDLIFE CORRIDORS'**

The land in question is a Wildlife corridor / foraging route including bats, a plethora of birds including owls and green woodpecker and small and larger mammals such as deer, badgers, offering habitat and vital foraging routes. This is also highlighted by Avon Wildlife Trust in their application comment.

***Table 13.26 of the ES Ecology chapter highlights that there will be no operational impacts to wildlife***

***network sites. However, the Feed Bristol site is part of the wildlife network and the proposed bus only junction and its associated construction compound will fragment the network and cut off the site from the rest of the network for the duration of the construction process. Together with the removal of hedgerow, scrub, meadow and mature trees to the north of the site, this will inhibit wildlife using the corridor for foraging and nesting purposes for over two years; the mitigation plan for landscape planting around the junction will only be effective many years after the Scheme has opened. The Landscape and Visual Impact assessment Para 11.6.51 itself states that "this will have a significant impact on the surrounding area in the short term but using mitigation techniques and landscape proposals with the reinstatement of allotment space, the long term effect would change to neutral". (Long-term defined as 15 years) (Avon Wildlife Trust Planning Application comment 2014)***

### **3.2 UNSATISFACTORY ECOLOGY SURVEYS:**

Atkins carried out a very poor and unsatisfactory ecology survey of this area, with some areas such as the abandoned barn and areas of the Feed Bristol Site not being surveyed at all. There was no recent or extensive surveying done after the regeneration of this area by Avon Wildlife Trust. Some of the surveying done also took place during the heavy rain and flooding. Therefore the results of which do not show a true picture of the ecological diversity and habitat within this piece of land. Thus are in contravention of Planning policy and legislation which requires thorough assessment.

### **3.3 DAMAGE TO VALUABLE FAUNA & ECOSYSTEMS:**

The proposed road development involves cutting through an old woodland copse which has been identified by Avon Wildlife trust as being Carr Woodland.

There are many trees planned to be felled including mature oak trees and others with numerous benefits. One of the reasons for refusal of this application should be for this reason: As it states in the National Planning Policy Framework (Clause 118):

***'planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland...'***

In another section of this scheme there are plans to impact upon ancient woodland Savages Wood, yet another example of disregarding valued and protected areas

The development would also damage hedgerow (despite the Planning application reports saying it would not,) the damage would be to hedgerows that are deemed ecologically or historically valuable have some protection under the Hedgerows Regulations (1997).

With the road development and Stapleton allotments being relocated on what is currently part of the Feed Bristol Lease. Grasslands and wildflower meadow are part of the land proposed for development. Grasslands and meadows are being seen as much more ecologically important than previously considered. Avon Wildlife Trust has focussed on regenerating and conserving this meadow and the wildlife has been increasing every year. To quote the Grasslands trust:

***“Wildlife-rich [grasslands](#) are a vital haven for wildlife - and are now one of our most threatened habitats. Over the years many have become intensively managed farmland or subjected to development - and their biodiversity has declined dramatically. Today, over 97% of our ancient meadows and grasslands have been lost.***

***Grasslands are the foundation of the British landscape with its hedged tapestry of meadows and pastures. These unique habitats which are home to many of our native species such as the cowslip, brown hare, short-haired bumblebee and Adonis blue butterfly, are vital for our biodiversity, ecosystem services, and enjoyment as communities, individuals and families.”***

(<http://grasslands-trust.org/news/protect-our-ancient-meadows-and-grasslands>)

### **3.4. STRATEGIC GREEN INFRASTRUCTURE**

The piece of land which involves building the proposed bus only road is a beautiful piece of wildlife rich land, which has status and has significant ecological, environmental and social value and amenity as it is part of the Strategic green Infrastructure network

The proposed development on Bristol Local Plan Core Strategy contravenes the Lead Policy on BCS9: Green Infrastructure

The land at Stoke lane onwards is part of the Strategic Green Infrastructure Network clearly shown in a map in the SADMP document:

***“2.16.9 Core Strategy policy BCS9 (diagram 4.9.1) shows the Strategic Green Infrastructure Network.”***

It then goes on to say that: ***“New or enhanced areas of public open space, on or adjacent to this network should be designed to connect to this network to maximise sustainable access to the functions and benefits it offers.”***

The M32 junction and road system has the opposing effect of cutting through and creating a physical barrier to this network. Therefore contravenes Local Core Policy and must not be given permission to proceed in this location.

This section of the Planning application goes against Bristol's Biodiversity Action Plan. In its potential destruction and damage to this area. The opening statement of the plan is:

**Conserving and enhancing the diversity of Bristol's habitats and species for the benefit of wildlife and enjoyment of local people.**

This design does not do this- despite playing down the ecological impact it will have. Natural Environment Government White Paper **The Natural Choice: securing the value of nature** (June 2011), states that

***The natural world, its biodiversity and its ecosystems are critically important to our well-being and economic prosperity, but are consistently undervalued in conventional economic analyses and decision making***

***We need a more strategic and integrated approach to planning for nature within and across local areas, one that guides development to the best locations, encourages greener design and enables development to enhance natural networks for the benefit of people and the environment as part of sustainable development.***

***We will retain protection and improvement of the natural environment as core objectives for local planning and development management. The planning system will continue to facilitate coherent and resilient ecological networks in association with local partners and reflect the value of natural systems. We want the planning system to contribute to our objective of no net loss of biodiversity; to encourage local authorities to promote multi-functional development so that we get the most from land; and to protect our best and most versatile agricultural land. (paragraph 2.35).***

I request that this is indeed how the planning committee and planning team act and respond to the NFHP MetroBus application.

### **3.5 DEVELOPMENT ON GREENBELT – NOT JUSTIFIED SPECIAL CIRCUMSTANCES**

The land lies within North Bristol's only Greenbelt

As the NPPF states:

“87. As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved **except in very special circumstances.**”

88. When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. **‘Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.**”

This planning application offers the need for economic growth and sustainable transport as outweighing the harm done to this Greenbelt area. However it does not offer any concrete evidence that this part of the scheme would contribute to this end. The application states that it will help with “economic growth” and “unlock” employment. There is no evidence of this.

Especially as huge increases in housing numbers in the North Fringe (in South Gloucestershire) are set to balance out the residential / employment levels on the North Fringe, meaning there may well not be significant employment opportunities on the North Fringe for people living in Hengrove after all, as the scheme states as it's justification.

No in depth studies or research has evidenced that clearly demonstrate that there employment opportunities even exist and if they do so then are no reachable by other forms of transport – i.e. existing bus routes, bicycle, train. Or that existing bus routes could be created without this seriously negative impact on Greenbelt and other areas as outlined in this comment.

Planning Statement Appendix 6 of the application. p.85 states that “the M32 bus only junction will facilitate faster journey times to UWE, enabling a 3 ½ minute time saving as opposed to a journey via A4154 and M32 Junction One....Additional journey time via Junction One significantly diminishes the attractiveness and potential of the Scheme.”

- A better-designed MetroBus scheme could still go ahead without the M32 Bus Only junction & road in this location. A slightly longer journey time would avoid this whole road system and would not be majorly damaging to the overall scheme and thus negated the “special circumstances the applicant puts forwards.

The applicant attempts to justifies a highly unjustifiable choice of location and design using background context and overarching objectives of the scheme – when these are NOT actually location or design

specific ( apart from 3.5 minutes) . This bus only road and junction is unjustified in its choice of location and contravenes National policy and local Bristol and South Gloucestershire Core Strategy and must not be approved.

### 3.6 THE THREE DIMENSIONS OF SUSTAINABLE DEVELOPMENT

The NPPF makes clear that the purpose of the planning system is to contribute to the achievement of sustainable development, which includes three dimensions: economic, social and environmental. The need argument presented by the applicant (submission docs Appendix E) is too heavily concentrated on the economic role that the planning system performs and the very special circumstances is therefore undermined by this narrow focus.

To obtain infrastructure funding from central Government, a business case would have provided figures for sustainability and regeneration benefits. However, it is difficult to quantify the social loss of future opportunities for such productive land and the permanent loss of Green Belt land for such unconvincing social benefits as a 3.5 minute time-saving.

Regeneration UK in a report to the Government identify ***“steps by which Government would enhance the likely effectiveness of and chances of success for its policy.....There must be more explicit recognition of the social and physical strands of sustainable development and regeneration in addition to the economic,***

**The absence of the social and to some extent environmental considerations of the application leaves it very narrowly focussed and not suitable for permission.** The EU/UK policy defines as 'regeneration' (e.g. economic AND social?), as it is cited as part of very special circumstances by the applicant. What should the future focus of Bristol and South Gloucestershire's sustainable development and regeneration be particularly in the light of Green Capital 2015?

Inappropriate development must be clearly outweighed by other considerations. As the applicant has failed to produce a balanced case in respect of both what the NPPF terms 'sustainable development' and what EU/UK policy views as 'regeneration', no very special circumstances exist.

### 3.7. IMPACT ON GREENBELT LOCATION

As quoted in the Planning application the NPPF states that

***“90. Certain other forms of development are also not inappropriate in Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in Green Belt. These are:***

☒ ***mineral extraction;***

☒ ***engineering operations;***

☒ ***local transport infrastructure which can demonstrate a requirement for a Green Belt location; “***

#### **DOES NOT PRESERVE OPENNESS**

This design will have a clearly negative impact on the openness and there is no clear evidence given by the applicant to show otherwise:

The Planning Statement Green Belt Assessment purports that



***“The fundamental aim of Green Belts from a national policy perspective is to ‘prevent urban sprawl by keeping land permanently open’. Taken together, the openness of the Green Belt is one of its most important attributes and it is important to safeguard its open character.”***

***“The openness of the Green Belt would, to some extent, be diminished by this addition of new carriageways and structures in this particular location. However, the careful siting, design and land take requirements posed by the Development would, however, ensure the Development would not have a materially significant impact on the openness of the Green Belt. This is for the following reasons:***

The definition of openness in the Oxford dictionary is that of “the quality of not being confined or covered”. The road design and the associated compound (see zone 04 proposed compound area route diagram.) would indeed cover a significant area of land with tarmac road, fencing, bus stops etc. It would have a HUGE impact both visually and environmentally on this area which is not being addressed adequately in this design. The applicant has stated that the tree planting and landscape mitigation would take 15 years to be significant – and even then would leave the area seriously impacted on environmentally and socially.

I would like to question what that applicant means by “**materially significant**”. Whose opinion is this? Is this backed up by any evidence? I challenge this assumption, which does not take into account the seriously negative impact on the openness of this development.

The applicant states that

***☒ the Scheme is enclosed by significant landscape buffer planting, with tree and landscape planting along the engineered embankments of the new road and substantial mature landscape buffers along Stoke Lane and the existing farm access track. These landscaping proposals do not compromise the openness of the Green Belt; 81***

The road and pathways will be fenced off from Stapleton allotments and Feed Bristol, with mesh fencing, and planted trees. There are currently only tree and hedgerow partitions between the small holdings and thus this will compromise the openness of the Greenbelt by creating physical and visual barriers.

***☒ by its very nature, the development is tied to the existing highway and appears much less prominent than if it was positioned some distance away. With the passage of time, the substantial landscaping planting would have the effect of screening the additional road infrastructure, including detracting elements such as tarmac surfacing, bus stops, signage and traffic controls, and will assist maintaining the current impression of a continuous green buffer along either side of the M32, which assists in preserving the openness of the Green Belt;***

I would like to challenge and ask the Planning committee to question this assumption of “less prominent”; The road being linked to the M32 can not detract from the fact that the design is proposing the development of huge road and compound (during the construction phase is on land which is predominantly rural and food growing. I would also like to highlight the phrase “With the passage of time” in regard to the planting of trees / landscaping would somehow screen the road - and associated parts – which include very large bus stops/stations (23-40 metres in length and over 2 metres height. The applicant does not note how long it takes for mature trees and plants to grow to a sizable height and width and the seasonal changes to foliage of deciduous trees. The applicant has already as previously discussed stated that landscape and plantings will take 15 years to reach full maturity – this “passage of time” slight improvement on the destruction this will cause does not make this development justifiable

#### **INADEQUATE JUSTIFICATION**

***☒ through these measures, the additional road infrastructure would, despite its size, remain subservient to the M32 carriageway which presently creates a significant detracting and separating feature in the Green Belt;***

The M32 indeed does detract from the local area, however this I argue offers even more reason to NOT detract further from the Greenbelt, the proposal by this statement is not in line with the Planning Policy

NPPF which states that under “very special circumstances” and proof of need in that area should any development on the Greenbelt take place.

**☒ the Scheme’s vertical elements would be visible from distance, however, in order to reduce their impact, they are to be unlit and are unlikely to significantly alter the character of the existing landscape, which already contains a number of detracting visual elements such as bridges, roads and motorways. Nonetheless, the design measures would help to ensure that the Scheme would have minimal impact on the setting of the countryside and prevent any potential local disturbance.**

### **3.8 IN CONTRAVENTION OF PURPOSES OF THE GREENBELT**

The applicant states that this design does not go against the purpose of the Green Belt – I argue that it does:

#### **PURPOSE: TO CHECK THE UNRESTRICTED SPRAWL OF LARGE BUILT-UP AREAS**

The applicant does not give direct evidence of how this development would not go against this purpose of the Greenbelt. The applicant states

***The Scheme will be located in the Bristol Green Belt between the A4174 and the M4 (SGC administrative area) and between the Stoke Lane, the M32 and Frenchay Park Road (BCC administrative area). Both of these areas are corridors of open land located between major road arteries and the edge of the Greater Bristol urban area.***

***The introduction of the proposed development is designed to relieve pressure on these areas by tackling congestion and encouraging the shift to new forms of public transport. This will also enable economic development to occur within Greater Bristol area, including at Cribbs Causeway, the Filton Aerospace conglomeration, UWE and Emersons Green Science Park, as well as helping existing areas of regeneration to grow, particularly at Hengrove Park. In turn, this has a role in helping to remove pressure to develop the Green Belt for economic growth.***  
***There will be no conflict with this purpose.***

The applicant is offering contradictory arguments – as it also states that the requirement and special circumstances are for economic growth – thus is putting pressure the Green Belt to development for economic growth in this very application.

I would question this presumption- indeed the building of a major road system – which is inextricably linked to a future planned M32 Park & Ride is urban sprawl. The development is on Bristol Council open land and Greenbelt, and is not in any way maintains its current extent of peri rural openness, agricultural and park like nature. South Gloucestershire border is very close. This development would cut through this Green belt – which continues up in a continuous Green strip.  
As the Greenbelt assessment states

***The adopted South Gloucestershire and Bristol Core Strategies also include related principles: “The extent of the Green Belt will remain unchanged from that shown in the South Gloucestershire Local Plan” and “Countryside and other open land around the existing built-up areas of the [Bristol] city will be safeguarded by maintaining the current extent of the Green Belt.”***

#### **PURPOSE: TO ASSIST IN SAFEGUARDING THE COUNTRYSIDE FROM ENCROACHMENT**

The applicant does not give adequate evidence of how this development would NOT go against this purpose. The applicant states:

***The NPPF and PPG2 do not contain a definition of encroachment. However paragraph 3.5 of PPG2***

***did provide examples of essential facilities for outdoor sports and recreation which needed not to conflict with Green Belt purposes and preserve openness, including ‘small changing rooms or unobtrusive spectator accommodation for outdoor sport...’ This indicates that an assessment as to whether there is encroachment should involve a judgement as to its effects on the change of use of the land. These accords with some of the definitions of encroachment in the Oxford English Dictionary, for example ‘to intrude beyond natural or conventional limits’.***

***Furthermore, by including local transport schemes under paragraph 90 of the NPPF (see paragraph 2.7 of this assessment) it must have been contemplated that in principle some such schemes must be capable of not involving conflict with Green Belt purposes.***

The above greenbelt purpose of the Green belt to safeguarding that which “intrude[s] beyond natural or conventional limits [on] the land and scenery of a rural area’. (Definitions by Oxford Dictionary). This definition is clear: Building a road system and huge over-bridge on this Greenbelt land is by no means upholding this purpose and indeed totally goes against it.

Furthermore the applicant presumption that there has been contemplation of ***“some such schemes”*** by another party negates the responsibility on the part of the applicant in taking responsibility for the impacts of this proposed application and it going against local and National Planning policy.

### **3.9 DOES NOT DEMONSTRATE A REQUIREMENT FOR GREENBELT LOCATION:**

The planning application in question ***does not*** demonstrate a substantial reason why this section of the MetroBus system is REQUIRED to be in a Green Belt location and is in no way clearly outweighed by other considerations: . Indeed the reasons given do not show exceptional circumstances and The applicant states that

In the Planning statement (P87) the applicant states that investment into public transport infrastructure to stop congestion worsening was needed to stop the threat to growth potential and the unlocking of new development. It also states that Within the North Fringe the Scheme is predicted to result in a modal shift for commuters away from car based travel,

This however DOES NOT show a requirement for THIS design and THIS location.

There is NO CLEAR EVIDENCE or research shown which demonstrates this bus only road system is a pivotal part of this design except the very weak statement that the current design of ***“the M32 bus only junction will facilitate faster journey times to UWE, enabling a 3 ½ minute time saving as opposed to a journey via A4154 and M32 junction 1....Additional journey time via Junction 1 significantly diminishes the attractiveness and potential of the Scheme.***

Where as this information come from? What research has shown this? How will 3.5 minutes make such a huge impact on this scheme? Does 3.5 minutes really justify all of this damage and negative impact?

There has been no evidence of any considered or alternative designs – such as the one submitted by the renowned transport academic at UWE Dr Graham Parkhurst, which indeed demonstrates a viable option which draws on less land. The current design is one which takes a large area of the Greenbelt land; it slices through beautiful woodland, open meadows, tree nurseries, and food growing land. I would like to suggest that this design has been sited in this location, with these design elements and rushed through, in order to be able to secure the government funding and to serve the (ill founded) aspirations of an M32 park and ride NOT to further the MetroBus scheme itself. `

### **3.10 NOT VALUING URBAN FRINGE**

***In the Planning application there is a Green Belt Assessment – it states that this area is an “urban fringe”. In England in 2005, The Countryside Agency and Groundwork worked in close partnership***

*with the Forestry Commission, English Nature and DEFRA's Rural Development Service together with Groundwork, a community and environmental regeneration body, produced a vision for the 'countryside in and around towns' that sets out ten 'functions' for a multi-functional urban fringe. In their report: 'Vision for the Countryside In and Around Towns' – the vision reflects this context and identifies 10 potential functions and that “....the countryside in and around towns contributes substantially to sustainable development through provision of the public benefits expressed in the vision document.”*

*(These benefits are :)*

- “• A bridge to the country*
- A gateway to the town*
- A health centre*
- A classroom*
- A recycling and renewable energy centre*
- A productive landscape*
- A cultural legacy*
- A place for sustainable living*
- An engine for regeneration*
- A nature reserve”*

### **3.11 IMPACT ON OPEN SPACES**

Please see Site Allocations map which show the intended site comes under the title of Green belt but also within a cluster of Important Open Spaces. <http://maps.bristol.gov.uk/jsmapper/?service=sadp2013&npacode=NP05> map

In the SADMP it states that:

Important Open Spaces

Development on part, or all, of an Important Open Space as designated on the Policies Map will not be permitted unless the development is ancillary to the open space use.

Unidentified Open Spaces

Development which would result in the loss of open space which is locally important for recreation, leisure and community use, townscape and visual amenity will not be permitted.

### **4.0 NOT SUSTAINABLE DEVELOPMENT – IN “GREEN” CAPITAL 2015?**

*The EU Regional Policies paper “Cities of Tomorrow, Challenges, visions, ways forward” states how*

*• Making cities ‘green and healthy’ goes far beyond simply reducing CO2 emissions. A holistic approach to environmental and energy issues has to be adopted, as the many components of the natural ecosystem are interwoven with those of the social, economic, cultural and political urban system in a unique manner.*

*A particularly important new material consideration, called the ‘presumption in favour of sustainable development’ within the National Planning Policy Framework.*

*“The presumption in favour of sustainable development “*

*The government definition for “Sustainable development means encouraging economic growth while protecting the environment and improving our quality of life - all without affecting the ability of future generations to do the same.” (Making sustainable development a part of all government policy and operations)*

The MetroBus design does not do this; the applicant's view of sustainable development is infinitely limited to an unproven idea "economic growth"

The applicant does not take into account the wider reaching and multi dimensional aspects of sustainability as identified in the NPPF - that of economic, social and environmental. The need argument presented by the applicant (submission docs Appendix E) in regard to building on Greenbelt land is too heavily concentrated on the economic role that the planning system performs and the very special circumstances are therefore undermined by this narrow focus.

A transport system which rips through green spaces, develops on or next to some of the best and most versatile food growing land in the country valued, esteemed, therapeutic and beneficial community projects, green belt, conservation pockets and uses a fossil fuel, unsustainable materials and energy to build is in no way sustainable.

NPPF 27. Where an application fails to satisfy the sequential test or is likely to have significant adverse impact on one or more of the above factors, it should be refused.

Sustainable development as the EU regional Policies paper "Cities of Tomorrow, Challenges, visions, ways forward" states

"The development of sustainable mobility is a key challenge for the Cities of tomorrow. Sustainable mobility includes several dimensions and components : sustainable, energy-efficient and affordable public transport systems ; ....**local transport networks that need to be well connected to regional networks ; peri-urban networks that need to be planned within the context of overall land-use and spatial development ; and transport nodes that need to be well integrated with social, cultural and economic activities, including leisure.**" (P45)

In the light of Bristol being Green Capital 2015 this must be reviewed and redesigned to ensure truly sustainable design.

#### 4.1 UNSATISFACTORY AND INCOMPLETE DESIGN & PLANNING APPLICATION

The design for the road system has been rushed through and is not complete, or gone through all of the necessary checks, technical tests and processes needed. The highways agency has written a letter (amongst the planning documents) which states

However we are not yet in receipt of the modelling of the new junction and the design has required the submission of multiple departures that are currently with NETSERV for their assessment.

On that basis I attach a form TR110 that directs non determination for a period of up to six months to allow the required technical work to be completed.

As I write this the soil at the allotment site is being tested by borehole and pits – to see if indeed it is suitable for construction, the land on the other side of the motorway was also tested after the application had been submitted. When we requested to see this report we were told it was not relevant to the application, but local conversation with site technicians revealed that the land was not suitable for construction due to instability. This essential information is not part of this Planning application Therefore this planning application cannot be granted permission to go ahead as it is not safe or correct to do so.

- Misinformation and inaccessibility of documents has been rife during the recent planning phase. Documents are regularly inaccessible on the Bristol City Council website. There are inconsistencies in maps which show different things and documents have been presented as draft copies when in fact they are final copies.

**This shows that this application is incomplete and missing vital evidence which would be in line with NPPF 7 and the design criteria.**

## 4.2 INADEQUATE CONSULTATION PROCESS:

In the Community Involvement statement the Planning application states the CIC process met the requirements of South Gloucestershire Council's Corporate Consultation Framework. However I would say that this part of the application and the consultation DID NOT.

**The Council's Corporate Consultation Framework states how "...the key objectives of the consultation process were to ...**

- **Address constructive feedback through the iterative design process to fine tune the Scheme where required and feasible; and**
- **Report back during the Application process to inform stakeholders and communities how their input has informed the Scheme design.**

### **Must**

- **Involve people at a stage where decisions can be influenced**

### **Should**

- **Show that decisions have not already been made**

### **Do not**

- **Consult for the first time on finalised plans**

- Throughout the design process there has been a failure to incorporate community opinion and feedback into development and design decisions.

- The project team has been presenting Avon Wildlife Trust and Stapleton Allotments, in their briefings to Bristol Planning Committees, as willing participants, stating there is no opposition to the scheme this is deliberately misleading. The Project Team know there has been much opposition.

**The design of the road system has not changed in any way despite much negative feedback from local people and principal stakeholders.**

## 4.3 INADEQUATE CONSULTATION AND MITIGATION FOR STAPLETON ALLOTMENTS

On Stapleton Smallholdings and Allotments 43 existing allotments and 23 existing smallholdings will be lost as a result of the construction of the bus-only junction.

Some of the lost allotments have been actively cultivated for up to 35 years. Allotment holders were not given a choice or asked their opinion on whether they were happy with there allotments being reconfigured or having a road system and building works through them. Instead the consultation consisted on them being asked what they would like when the allotments were reconfigured and being offered £1000 per plot to compensate for their loss.

I would like to draw to attention to this lack of public consultation in the true sense. There is no consultation on the planned development, only consultation of "how" it would be reconfigured.

As the CIS states that "In 2012, the allotments manager carried a consultation survey of allotment holders independently of the NFHP MetroBus team. The survey asked allotment holders what they might wish to see on a reconfigured allotment site, if planning consent were granted for the M32 bus-only junction.

In the above "survey" only 17 allotment holders responded –in what way is this adequate consultation? The allotment holders were also not consulted on the road design, any alternatives or asked their opinions. This demonstrates an inability to demonstrate real community involvement or carry out appropriate consultation process.

The allotment holders who would lose their plots permanently are being given alternative land on what is currently Feed Bristol land or put on inferior land next to the motorway. This goes against allotment

guidelines which state that allotment holders should be given land of equal or better quality if they are moved.

Adequate mitigation has not been offered and in any case will only commence in 2018 after the construction phase. That is up to four years of potential food production lost from 73% of smallholding plots or 40% of allotment plots. The residual long-term impacts on the affected Best & Most Versatile land in terms of reduction of soil quality are not quantified in the application. The full impacts in terms of soil are discussed in a separate section.

#### **4.4 ISSUES WITH DOCUMENTATION – AN UNFAIR AND INADEQUATE PROCESS**

A search Keywords such as MetroBus, Hengrove or North fringe does not come up with the Planning application. I spoke to Mr Matthews the planning officer many months ago to report this, however this never changed. This caused people great difficulty in finding the application information to facilitate involvement and comments.

- Misinformation and inaccessibility of documents during this planning phase. Documents are regularly inaccessible on the Bristol City Council website. There are inconsistencies in maps which show different things and documents have been presented as raft copies when in fact they are final copies.
- The project team has been presenting Avon Wildlife Trust and Stapleton Allotments, in their briefings to Bristol Planning Committees and participants, they have been stating there is no opposition to the scheme this is deliberately misleading as the Project Team know there is strong opposition...(This has been commented to the Blue Finger Alliance by local councillors)

#### **4.5 RECOMENDATIONS:**

- Develop new policy and strengthen existing policy to protecting soil, wildlife corridors, green infrastructure, food growing land and community initiatives.
- Redesign the MetroBus (NFHP) in such a way that it does not involve damaging soil, wildlife habitat, heritage assets, the strategic green infrastructure and the Green Belt
- Research into alternative routes for the MetroBus, including Junction One alternative which can meet a Park and Ride closer to the M32/4 interchange. Again, this might only be developed without adverse impact on high grade soil, biodiversity and food growing potential.
- Discussion with transport and traffic, ecology, soil, wildlife and conservation experts.
- Undertake a conservation area appraisal with the Council for Stapleton and Frome Valley Conservation area.
- For the Councils and Project Team to listen fully and respond appropriately to comments of ALL Stakeholders. Consultation will need to happen with all stakeholders and statutory consultees and their opinions taken into account.

There have been major advances in Bristol as a sustainable city in the last 2 years such as;

- Bristol Green Capital 2015
- UK Sustainable Food City
- Rockefeller 100 resilient cities global Network

This is not adequately reflected in The (NFHP) MetroBus Planning Application or the (almost adopted) Bristol Local Plan 2014. This is an opportunity to move Planning and development decision making towards a truly sustainable and positive future.