

**1 Is the strategy based on a sound and rigorous assessment of the transport needs of South Gloucestershire?**

**Location of Development**

- 1.1 No, the strategy does not adequately assess the impact of the provision of 12,300 new dwellings (and associated employment, retail and community uses) in the North Fringe of Bristol.
- 1.2 In essence, in our view the strategy identifies too much development in the North Fringe and as such risks not delivering the required number of dwellings within the plan period.
- 1.3 Whilst it is accepted that new dwellings are required in the North Fringe to provide housing in close proximity to the existing and proposed employment / retail areas, the scale of development proposed is excessive in relation to the transport infrastructure proposed. Moreover, it is vital that the transport infrastructure is provided at an early stage, which cannot be guaranteed. This is identified in Para 3.7 of the Core Strategy (CS).

**Travel Patterns**

- 1.4 Existing travel patterns from the 2001 Census shows that approximately 37% of working residents in the East Fringe (Siston, Oldland Common, Bitton, Longwell Green, Hanham, Parkwall, Woodstock, Kings Chase, Rodway, Staple Hill and Downend wards) also work in the East Fringe. This level of self-containment is comparable to the North Fringe (Bradley Stoke, Patchway and Stoke Gifford wards). The Census data also shows that 37% of working residents in the East Fringe work in central Bristol compared to 28% of North Fringe resident workers.
- 1.5 The Science Park development at Emersons Green will provide a minimum of 9,000 jobs (from West of England Major Scheme Best and Final Bids, September 2011). This will assist workers living in the East Fringe to reduce their need to travel into central Bristol or to the North Fringe to work. This is a significant number of new jobs (13%) when compared to the 70,000 jobs that presently exist in the North Fringe (Para 4.7, CS) and should be supported by more housing than presently identified in the CS at Emersons Green East (2,400 dwellings).
- 1.6 Para 4.18 of the CS acknowledges that the East Fringe significantly under-provides for the local workforce.
- 1.7 Therefore, it is clear that additional development in the East Fringe will be required to avoid further in-commuting / out-commuting. To this end, a mixed use development in the East Fringe that provides significant additional employment opportunities, as well as new housing, in a sustainable location. It would meet the requirements of the NPPF in respect of sustainable development and would help to redress the unrealistic expectation of SGC that the North fringe can deliver 50% of the district housing requirement over the plan period. The National Planning Policy Framework (NPPF) states in Para 37 that land uses should be balanced within an area to “*minimise journey lengths for employment, shopping, leisure, education and other activities*”.

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- 1.8 The Infrastructure Delivery Plan (IDP) prepared by the Council in February 2011 comments that the North Fringe suffers from congestion and that barriers to movement to/from the area already exist.
- 1.9 The need to locate development where it will provide the opportunity to minimise the need to travel is identified in Para 4.2 of the CS.

#### **Review of Strategic Transport Case**

- 1.10 The Council published new evidence entitled the “Review of Strategic Transport Case” on 14 May 2012 (hence referred to as the RSTC), although this was not actually available on the Council’s website until the w/c 21 May 2012. This work was undertaken by Atkins on behalf of the Council and is described in the RSTC as “*an independent review*” of the transport case at the 4 locations identified within the CS plus land referred to as “South of Emersons Green/East of Kingswood”. This land is also known as the Warmley Urban Extension.
- 1.11 The RSTC purports to have adopted a “*systematic and objective method to assess each location, in line with established transport planning best practice*”. It also states that “*it has drawn upon a range of supporting evidence including accessibility information drawn from a computer-based transport model*”. This evidence is not presented as part of the RSTC and, as such, cannot be commented upon.
- 1.12 The RSTC confirms in Para 2.11 that the NFHP, which includes the link to Emersons Green, has secured Programme Entry status from the DfT and that construction is expected to commence in 2014. The Emersons Green to Temple Meads Rapid Transit Scheme has been delayed until at least after 2020.
- 1.13 The criteria used to assess the transport case for each location are as follows:
1. *“Whether the location will enable connectivity and accessibility for walking and cycling to key destinations;*
  2. *Whether the location is already or can feasibly be served by high quality direct public transport links to key destinations;*
  3. *Whether the impacts of additional traffic to/from the location on key traffic routes can be minimised;*
  4. *Whether strategic transport infrastructure can feasibly be provided to provide/improve (sic) connectivity to the location within the Plan period.”*
- 1.14 The performance of each location was then assessed against each of the above criteria using a three point scale as follows:
1. *“Positive (+ i.e. the location performs well against the criterion;*
  2. *Negative (-) i.e. the location performs badly against the criterion; or*
  3. *Neutral (N), where the location is judged to perform neither positively or negatively against the criterion.”*
- 1.15 The four criteria are numbered 1 to 4 in the RSTC and as shown above in 1.13. However, these are numbered differently in Table 1 (Appraisal of Locations against Transport Criteria) where what was criteria 4 is now criteria 6. This suggests that this table was taken from another document where at least 6 transport criteria were used

- to assess the different locations. Obviously we cannot be sure what the other criteria were or why they have been omitted from the RSTC.
- 1.16 The area South of Emersons Green/East of Kingswood (the Warmley Urban Extension) scores poorly, i.e. 'Neutral' for criteria 1 and 2 and a 'Negative' for criteria 3 and 4 (or 6 if reading from Table 1 in RSTC).
- 1.17 Not surprisingly, the 4 areas identified for development within the CS all score well with no 'Negative' scores.
- 1.18 The explanations for the poor scores achieved by the South of Emersons Green/East of Kingswood (the Warmley Urban Extension) are listed in the RSTC (Para 3.6) and appear to have been based upon the Transport Report prepared by FMW in November 2011.
- 1.19 We do not concur with the findings of the RSTC for the following reasons:
- Out-Commuting
- 1.20 Whilst it is accepted that out-commuting occurs from this area it is not agreed that this is vastly different from what happens in the North Fringe. In our view responding to this by not providing additional housing and employment development in this area but to provide nearly all the new housing in the North Fringe is irrational. This will lead to commuting to/from this area as a result of the Science Park development referred to in 1.5 Therefore we believe that a mixed use development that provides significant additional employment opportunities, as well as new housing, is required in this part of the East Fringe.
- Proximity to Local Facilities
- 1.21 The area is well located for travel by sustainable modes to a range of local facilities that include employment, retail, education, leisure and community uses.
- 1.22 Moreover the area is located next to the Bristol to Bath cycle path and would be served by a new regular bus service linking to the Longwell Green and Emersons Green district centres, as well as other key destinations. This is dealt with in greater detail below.
- Cycling
- 1.23 The site is located next to the Bristol to Bath cycle path, which provides a direct segregated link to Bristol (10km or 6 miles) and Bath (13km or 8 miles). This means that both of the major cities within the West of England area are within a relatively easy cycle distance.
- 1.24 To suggest that "*cycling is likely to be limited to more local journeys*" for an area located next to what is universally accepted as the best cycle infrastructure in the West of England is laughable were the consequences not so serious.
- Buses
- 1.25 A new bus service is proposed to operate between the Longwell Green and Emersons Green Retail Parks that would also serve the development area. This would provide a direct and frequent service to local facilities and enable a link to the proposed Rapid Transit terminus at Emersons Green (as part of the NFHP).

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Rail

- 1.26 We agree that there are no obvious opportunities for rail travel to/from the area. However, we do not agree that public transport choices are limited to bus as the Rapid Transit network will be accessible at Emersons Green as part of the NFHP.
- 1.27 It is also worth noting that this criticism could easily have also been levelled at the sites in the North Fringe as they are only providing land and a contribution for new stations on the Hallen/Henbury line. The delivery of passenger services on this line that could serve the North Fringe is subject to a separate business case.

Impact upon A4174 Ring Road

- 1.28 Appropriate improvements to the key junctions on the A4174 have been designed and can be modified further to include bus priority measures etc.
- 1.29 Thus, the impact upon the Ring Road is not a limiting factor to growth in this area in the same way that the M4, M5, A38 etc are not described as limiting growth in the North Fringe.

Strategic Transport Infrastructure

- 1.30 The NFHP is described in the Best and Final Bid document, September 2011 as three new rapid transit routes that link the North Fringe, East Fringe and South Bristol via Bristol City Centre.
- 1.31 The East Fringe could deliver residential and employment development land that could be sustainably accessed from the planned transport infrastructure with funding, i.e. the bus shuttle service proposed as part of the Warmley Urban Extension that links to the rapid transit terminal at Emersons Green. The NFHP will provide a direct service to the North Fringe and central Bristol every 20 minutes from 2016 as part of the NFHP (programme taken from Best and Final Bid document, September 2011).
- 1.32 The area will be within a short bus ride (new service) of the Emersons Green terminus and so offers real opportunities to achieve a modal shift away from the car towards more sustainable modes of travel.

Transport Assessment

- 1.33 The Transport Report prepared in November 2011, and submitted with our representations to the post-submission Core Strategy in February 2012, was undertaken to identify potential improvements to the surrounding road network as well as to identify opportunities for sustainable travel to/from the area.
- 1.34 This was based upon “worse case” traffic flow predictions that did not allow for linked trips within the area between the residential and employment uses nor were any reductions made to reflect Travel Plan measures or improvements to the surrounding public transport network (bus, NFHP etc). This was to ensure that the traffic impact was assessed in a very robust manner.

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**2 *Has sufficient regard been had to the impact of future development strategies of neighbouring authorities on levels of congestion and movement?***

- 2.1 Bristol City Council (BCC) have submitted representations on the CS that identify their concerns over the level of development proposed in the North Fringe, particularly the Cribbs Causeway / Patchway area.
- 2.2 BCC are concerned that the scale of development will have unacceptable impacts. In particular, BCC have identified that the road network is already under severe pressure and that there is no traffic impact evidence to demonstrate that the increased congestion can be successfully mitigated. This will have an effect upon sub-regional travel patterns and increase journey times between the North Fringe and central Bristol that will increase pressures on strategic routes.
- 2.3 Whilst the North Fringe to Hengrove Package (NFHP) will assist in mitigating the traffic impact of the proposed development, by offering a sustainable alternative to the car, other infrastructure proposals, such as the introduction of passenger services on the Hallen / Henbury railway line are less certain to be delivered as part of the new communities.

**3 *Is sufficient priority given to public transport improvements to reduce reliance on the car?***

- 3.1 The Council has sought to deliver public transport improvements, such as the Greater Bristol Bus Network (GBBN) and the NFHP, as part of the strategy.
- 3.2 However, the accessibility of development locations to other forms of sustainable transport, such as cycling, has not been maximised. For example, the Bristol to Bath Cycle Path, which provides a dedicated cycle link between the two cities and is readily accessible from the East Fringe. This seems at odds with the aspirations of a 'Cycle City' that is receiving funding from the DfT of nearly £12M and aims to double the number of cyclists in Greater Bristol.

**4 *Is the delivery of transport initiatives in policy CS7 realistic in view of economic uncertainties?***

**Developer Contributions**

- 4.1 The Council have stated in Policy CS7 that it will work with its partners to deliver several key transport initiatives within the plan period. This includes the following:
- Completion of the GBBN, which has secured funding at a total cost of £22.1M (£8.8M from the Department for Transport - DfT);
  - The construction of the NFHP, which secured approval from the DfT in December 2011 at a total cost of £102M (£51M from the DfT / £31M from SGC and £20M from BCC);
- 4.2 The other transport initiatives that the Council will deliver require funding to be approved by the DfT or are wholly dependent upon private / local funding (developers). These initiatives include the improvement of rail services (such as the re-introduction of passenger services on the Hallen / Henbury line) and the transport

- packages identified for the Cribbs / Patchway New Neighbourhood (NN), East of Harry Stoke NN, Yate / Chipping Sodbury NN, the Rural areas and the Ring Road (A4174, at a total cost of £34.5M).
- 4.3 Three other transport initiatives are included in Policy CS7 that will be delivered as part of major development schemes as follows:
- Romney Avenue Bus Link;
  - Emersons Green Multi-Modal Interchange and Roast Roundabout improvements;
  - New junction onto the A4174 and access road to Harry Stoke Local Plan site.
- 4.4 The magnitude of the developer contributions that will be required to deliver the level of housing identified in the CS for the North Fringe (taken from the Infrastructure Delivery Plan) is as follows:
- Cribbs Causeway / Patchway (excluding airfield) - £8.2M (would increase to circa £20M with airfield)
  - West of M32 - £10.76m
  - TOTAL - £30.76M
- 4.5 Thus it can be seen that the CS requires the Council to secure over £30M in developer contributions during the plan period (up to 2026) if housing in the North Fringe is to be delivered. The Council's ability to deliver these funds will not only be influenced by the prevailing economic conditions but also by the developer's ability to provide this money at an early stage, particularly when the development sites are all located in the same part of the authority.

#### **East Fringe**

- 4.6 The East Fringe could deliver residential and employment development land that could be sustainably accessed from the planned transport infrastructure with funding, i.e. the bus shuttle service proposed as part of the Warmley Urban Extension that links to the rapid transit terminal at Emersons Green. This route will provide a direct service to the North Fringe and central Bristol every 20 minutes from 2016 as part of the NFHP (programme taken from Best and Final Bid document, September 2011). Moreover, the development would provide another source of developer funding for this scheme that would be located in a different part of the authority, i.e. not in the North Fringe.

### **5 *Will policy CS8 provide an adequate basis for improving accessibility in South Gloucestershire?***

- 5.1 Policy CS8 correctly identifies the principles that will provide the users of the new developments with a range of travel options other than the private car.
- 5.2 However, as stated in our response to Q1 we believe that residential and employment development are required in the East Fringe in order to provide local facilities that will offer an alternative to travelling to work in the North Fringe / central Bristol or travelling to work in the East Fringe from these, and other, areas.

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**6      *What evidence is available to justify the 50% limit on garage spaces contributing to parking provision in major residential schemes?***

- 6.1      No evidence is provided to justify the 50% limit on garage spaces contributing to parking provision in residential schemes.
- 6.2      Para 7.21 of the CS refers to the Council undertaking a review of Parking Standards. As far as we are aware, these have yet to be published for consultation and so should not be relied upon to justify the proposed Policy CS8.

**7      *Should the policy make clear how car parking will be addressed?***

- 7.1      Yes, Policy CS8 (4.) should clearly explain how residential parking should be provided and at what levels rather than referring to the “more flexible approach” that the Council may adopt in some cases.
- 7.2      Para 39 of the NPPF states that local authorities should take account of specific factors when setting local parking standards. These include accessibility, mix, public transport and car ownership levels.