



## SOUTH GLOUCESTERSHIRE CORE STRATEGY EXAMINATION IN PUBLIC

### MATTER 14 - STRATEGIC TRANSPORT AND ACCESSIBILITY (POLICIES CS7 & CS8)

#### HEARING STATEMENT

On behalf of:  
**WELBECK STRATEGIC LAND LLP**  
Respondent ID: 4038145

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May 2012

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#### **INTRODUCTION**

1. This Statement has been prepared by Cannon Consulting Engineers (Cannon) on behalf of Welbeck Strategic Land LLP (Welbeck), with respect to their land interests at Hacket Farm, Morton Way South, Thornbury.
2. This Statement responds to the Inspector's questions posed for the Matters for Examination as detailed in the Programme for the Examination of the South Gloucestershire Core Strategy, dated the 25th April 2012. This Statement deals with questions relating to Matter 14 – Strategic Transport and Accessibility (Policies CS7 & CS8).
3. Where appropriate, the Inspector is referred to Welbeck's previously submitted representations in relation to the Core Strategy, particularly the February 2012 (SGC Reference 4038145) comments on proposed revisions to the draft Core Strategy Post-Submission version (Appendix W7: TN01 Highways and Transport).

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## STRATEGIC TRANSPORT AND ACCESSIBILITY

**Inspector's Question 1:** *Is the strategy based on a sound and rigorous assessment of the transport needs of South Gloucestershire?*

4. In short, no. The transport aspirations, aims and objectives for South Gloucestershire are set out in the Joint Local Transport Plan No.3 (JLTP3 - Examination Documents EB 47), however, there is no rigorous assessment of transport needs and no robust transport evidence base to support the Sustainability Appraisal (SA). The 'Accessibility Assessment' referred to in the 2011 SA is not available for inspection.
5. The Atkins May 2012 Reports: 'Review of Strategic Transport Case' (Examination Document RD41); Thornbury Transport Review (RD42); Local Model Validation Report (RD43); and Forecasting Report (RD44) have clearly been prepared in an attempt to 'shore up' the transport evidence base which is incomplete and insufficient to support the Sustainability Appraisal.
6. Atkins May 2012 Review of Strategic Transport Case and Thornbury Transport Review reports are superficial, with no detailed technical evidence or analysis. These reports are too late to inform the Sustainability Appraisal, there is no robust assessment of reasonable alternatives and the reports set out to support decisions that have already been made. Cannon's comments on the Atkins May 2012 Reports are set out below.

### ATKINS MAY 2012 REPORTS

- (a) The Atkins May 2012 'Review of Strategic Transport Case' (RD41) is just that, a 'review'; it contains no actual 'evidence' or detailed analysis. It is clear that Table 3 'Appraisal of Locations in the Thornbury Area', has been contrived to support the conclusions of the Sustainability Appraisal. Given their similar edge of urban area locations, Morton Way South (Option 3) should sensibly score the same as Park Farm (Option 6) in Table 3, except under Transport Objective No. 4 where Morton Way South should score higher than Park Farm. This is because the frequent bus service (Route 309/310) currently passes along Morton Way beside the Option 3 site and does not have to be diverted and extended from its existing route, as required for Park Farm (see Figure 2 below).
- (b) There is no evidence of Atkins having contacted the bus operator, First Bus, to determine the operator's view of diverting and extending services to Park Farm and no reference to the Welbeck Land submissions that Morton Way South would be First Bus's preferred Core Strategy development option. The Council (and the Park Farm developer) have presented no evidence that First Bus are prepared to divert the 309/310 service to Park Farm and no evidence of a contract with the owners of Castle School to deliver the bus link.
- (c) In Cannon's opinion, Atkins' 'Review of Strategic Transport Case' thus does not provide the level of detail necessary to make the transport evidence base sound and the conclusions are not supported by the evidence that is available.
- (d) The May 2012 'Thornbury Transport Review' (RD42) presents 'the conclusions' (paragraph 1.3) of Atkins' review of the soundness of the transport case for Park Farm (Option 6). There is no detailed analysis or technical assessment which should reasonably be required to support these conclusions.

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- (e) Paragraph 2.1 notes that the most frequent bus services do not currently access all parts of the north of the town. Paragraph 3.4 states that “*it will be possible to extend the routings of existing services to access the site via the main site access from Butt Lane and a new dedicated public transport link via Park Road*”. Again, there is no evidence from Atkins or First Bus to support this conclusion and no evidence of a contract which would enable the delivery of the dedicated bus link.
  - (f) Paragraph 3.17 states that “*the transport package described above is proportionate, realistic and affordable*” although no viability or cost evidence has been provided. Section 4 concludes that “*the sustainable transport measures required to support the development of the housing opportunity site can be delivered ... through existing delivery and funding mechanisms*” and that “*the likely costs of the Package measures are realistic and affordable*”. However, Atkins’ report presents no evidence that First Bus will divert and extend their existing bus service which is fundamental to the sustainability of the Park Farm site. No evidence is given of the cost of the bus service extension or the cost of delivering the bus link.
  - (g) Atkins May 2012 ‘Thornbury Transport Review’ (RD42) presents ‘conclusions’ with no detailed information and no technical analysis. In Cannon’s opinion, this May 2012 document does not carry out a review of Transport in Thornbury and does not demonstrate the soundness of the transport case for Park Farm.
  - (h) Atkins’ May 2012 ‘Local Model Validation Report’ (RD43) describes the development of a highway assignment model for the north fringe of the Bristol Urban Area. This model has been prepared to provide evidence to support the transport case for the north fringe and the model is referred to as the Core Strategy Model (CSM).
  - (i) The CSM, linked to two other models, enables forecasts to be made of transport demand and the corresponding highway and public transport flows in the north fringe area.
  - (j) Atkins’ May 2012 ‘Forecasting Report’ (RD44) describes the forecasting of the impacts on the transport network of the Core Strategy Proposals in the north fringe area. The forecasts indicate that there would be a 10% increase in highway travel demand and a very large (125%) increase in public transport demand between the ‘reference case’ and ‘do something’ scenarios.
  - (k) The report describes the process of forecasting future travel demand and travel conditions in the north fringe area using the CSM and explains that the delivery of the north fringe transport package will help to reduce car dependency in the north fringe area and encourage a large-scale shift to public transport. This, together with carefully targeted highway improvements, is intended to mitigate the impacts of Core Strategy development across the north fringe and north Bristol.
  - (l) In Cannon’s view, it is unreasonable for the CSM and Forecasting Report to be presented six weeks before the start of the Core Strategy Hearing Sessions, when a sound and robust transport evidence base should have been available to support the Sustainability Appraisals in 2010/11. The Reports appear to provide a reasonable level of information to support the assessment of development options, however, this information should be available to the decision makers at the start, and not the end, of the site selection process.

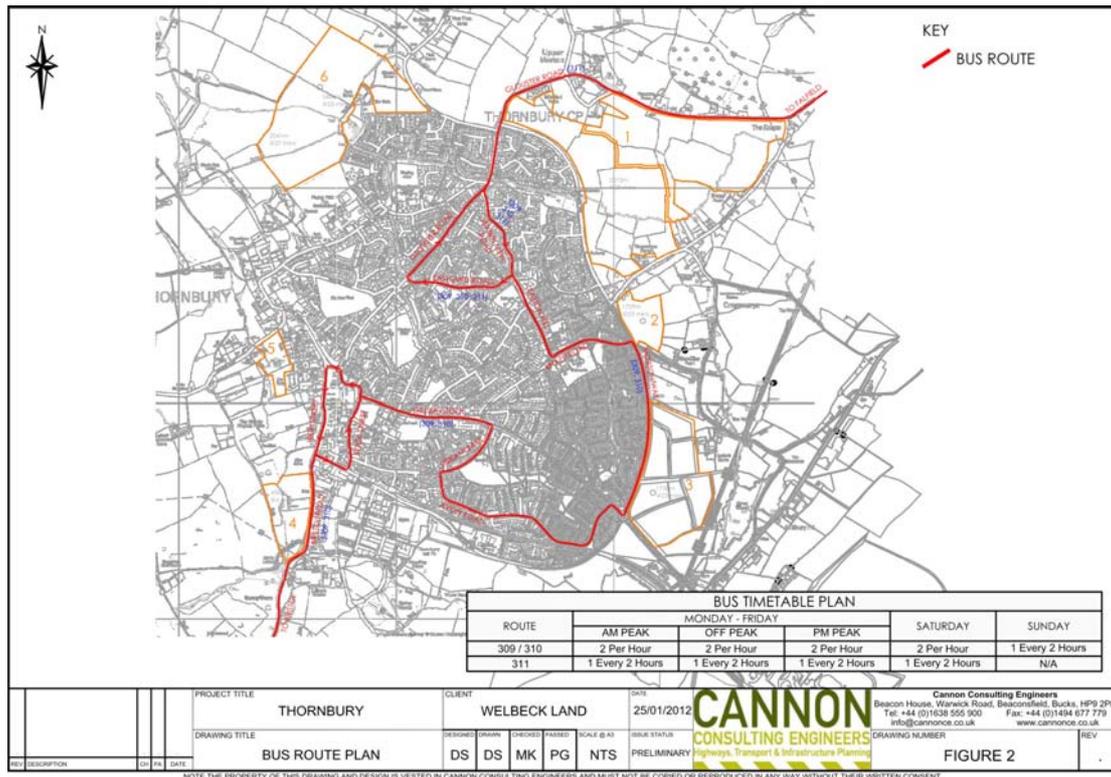
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**Inspector's Question 2:** *Has sufficient regard been had to the impact of future development strategies of neighbouring authorities on levels of congestion and movement?*

7. Superficially, yes; via the transport aspirations, aims and objectives for South Gloucestershire in JLTP3 (Examination Documents EB 47) and with input from the Highways Agency, however, there is no rigorous assessment of travel demands and associated levels of congestion, as would normally be expected in the form of a robust transport evidence base to support the Sustainability Appraisal.
8. The May 2012 Atkins Local Model Validation Report (RD43) and Forecasting Report (RD44) are moving in the right direction but they should have been available at the start of the Sustainability Appraisal preparation to support the assessment of reasonable alternatives, not provided as an after-thought once the decisions on development options had been made.

**Inspector's Question 3:** *Is sufficient priority given to public transport improvements to reduce reliance on the car?*

9. In strategic terms, yes; via the transport aspirations, aims and objectives for South Gloucestershire set out in JLTP3, however, in assessing the development options for Thornbury the strategic aims and objectives have not been followed through to the next level.
10. The preferred development option for Thornbury, Park Farm (Option 6) is fundamentally reliant on the delivery of a diverted and extended bus service and the provision of a dedicated bus link on third party land. There are no submissions from the local bus operator, First Bus, and there does not appear to have been any level of detailed discussions with them to determine whether they are prepared to divert and extend the 309/310 bus service to Park Farm and the cost of the associated bus subsidy.
11. Cannon met First Bus in January 2012 and a note of the discussion with them is included in Appendix W7 of Welbeck Land's February 2012 submissions on the proposed revisions to the draft Core Strategy Post-Submission version (SGC Reference 4038145). As set out in the meeting notes, in reviewing the six Core Strategy Option Sites, First Bus confirmed that Morton Way South (Option 3) would in their opinion be a preferred development option for Thornbury, as there would be no costs associated with extending the service, or for timetable or infrastructure changes.
12. This is consistent with the view of the Highway Authority in their February 2009 advice to the Planning Authority (see Appendix W7 of Welbeck's February 2012 submission) that "*to tie development in with existing bus routes - 312 and 309/310 ... gives the best option for the use of buses as it would cost money to introduce new routes*". The existing bus routes are shown on Figure 2.
13. Given that the diversion and extension of the existing bus services is fundamental to the development of Park Farm, and following Welbeck Land's February 2012 submissions, it is inconceivable that the Council have not contacted First Bus to determine for themselves the bus operator's position on services to Park Farm. In preparing this Hearing Statement, Cannon have re-contacted First Bus to establish whether they have been asked to prepare a written submission for the Inspector at the Hearing Sessions and whether their position has changed on the Core Strategy development options for Thornbury. First Bus have not been asked to provide a statement and their position has not changed (see Appendix W14); Morton Way South remains their preferred development option.



14. Perhaps of more concern, is the lack of evidence in the 2011 Park Farm planning application (ref: 11/1442) that the developer and their consultants have engaged with First Bus on the fundamental provision of bus services to Park Farm. The Park Farm planning application also specifically excludes the dedicated bus link across third party land which is essential to deliver the bus service. Neither the Council nor the developer have provided any evidence that this bus link can be delivered.

15. This is compared to the public transport position for Morton Way South, where the bus service exists at present for the First Bus ‘preferred’ development option at Thornbury.

**Inspector’s Question 4:** *Is the delivery of transport initiatives in policy CS7 realistic in view of economic uncertainties?*

16. Policy CS7 sets out the necessary ‘Strategic Transport Infrastructure’ to support the Core Strategy, taken from JLTP3 and the Sustainable Community Strategy. Given current economic uncertainties it is likely that the Infrastructure Delivery Plan (IDP - Examination Documents EB 22 and 22/1) will have to be further broken down and priorities assessed against likely funding commitments.

17. Strategic schemes that deliver a high cost benefit ratio for the existing community, such as the North Fringe to Hengrove rapid transit package approved for funding of £102m in December 2011, will almost certainly proceed during the Core Strategy period. Other measures which will have a lower cost benefit ratio, such as rail enhancements (CS7.3) and the high cost elements of the ‘packages’ (CS7.4 to CS7.8), will be more difficult to deliver during the Core Strategy period.

**Inspector's Question 5:** *Will policy CS8 provide an adequate basis for improving accessibility in South Gloucestershire?*

18. Policy CS8 'Improving Accessibility' sets out a number of principles to be applied in the consideration of planning applications, with respect to accessibility, mitigation, sustainability and parking. These principles are policy based and are consistent with normal development requirements. There is a cross reference to contributions to deliver the Strategic Transport Infrastructure in Policy CS7 and the IDP.
19. The policy is considered to provide an adequate basis for improving accessibility relating to new development.

This text is followed by:

Appendix W14 - First Bus email dated the 21<sup>st</sup> May 2012

Word count: 2182

Cannon CE/May 2012.

**Mark Kirby**

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**From:** Simon.Ford@firstgroup.com  
**Sent:** 21 May 2012 18:43  
**To:** Patrick Gurner  
**Subject:** RE: Thornbury, South Glous.  
**Attachments:** Figure 2 Bus Route Plan Layout1 (1).pdf

Hi Patrick

Our position remains the same with regards to the Core Strategy and I can confirm that we have not been asked to provide a statement for the Inspector to consider.

Kind Regards

Simon Ford  
Regional Network Planner

Telephone - 0117 3736425  
Mobile - 07808 509953  
Email - simon.ford@firstgroup.com

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First Cymru Buses Limited. Registered in England & Wales No. 00133884. Registered Office: Heol Gwyrosydd, Penlan, Swansea, West Glamorgan, SA5 7BN

**From:** "Patrick Gurner" <Patrick.Gurner@cannonce.co.uk>  
**To:** <Simon.Ford@firstgroup.com>  
**Date:** 21/05/2012 18:20  
**Subject:** RE: Thornbury, South Glous.

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Hi Simon,

I thought I would just check with you that First Group have not changed their position with regard to the draft Core Strategy, Moreton Way South and extended bus services for Park Farm. Also whether First have been asked to provide a statement for the Inspector to consider at the Hearings in June.

Kind regards

Patrick

**From:** Patrick Gurner  
**Sent:** 27 January 2012 10:14  
**To:** 'Simon.Ford@firstgroup.com'  
**Subject:** RE: Thornbury, South Glous.

Simon hi

Many thanks. I'll no doubt be in touch.

Regards

Patrick

**From:** [Simon.Ford@firstgroup.com](mailto:Simon.Ford@firstgroup.com) [<mailto:Simon.Ford@firstgroup.com>]  
**Sent:** 27 January 2012 10:10  
**To:** Patrick Gurner  
**Subject:** Re: Thornbury, South Glous.

Patrick

Thank you for your email.

I can confirm that your notes are an accurate account of our meeting.

Please let me know if you require any further information.

Kind Regards

Simon Ford  
Regional Network Planner

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From: "Patrick Gurner" <[Patrick.Gurner@cannonce.co.uk](mailto:Patrick.Gurner@cannonce.co.uk)>  
To: <[Simon.Ford@firstgroup.com](mailto:Simon.Ford@firstgroup.com)>  
Date: 27/01/2012 08:23  
Subject: Thornbury, South Glous.

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Dear Simon

Thank you for your time on Wednesday. I made the following notes;

1. The 309 and 310 bus services start at Thornbury and use the A38 corridor into Bristol, through Aztec West. The service has a reasonable level of patronage and is currently viable (just), with no financial support from the local authority.
2. South of the motorway, the 309/310 services can make use of the A38 bus lanes and bus priority measures into Bristol, providing a reasonable commuter service. Off-peak the 309 service makes a small diversion to Cribbs Causeway for retail trips.
3. From Figure 2 attached, the existing three bus stops along the Morton Way frontage could serve the development of Site 3 (Morton Way South), A small diversion of the bus route into the site could be considered, which would not make any significant change to the timetable.
4. Additional use of the existing service from new development adjacent to Morton Way would add patronage and improve viability of the existing 309/310 bus services.
5. Section 106 contributions from the proposed development could provide improved bus stops and shelters, and a possible contribution towards improved services such as a possible new bus service to Gloucester, which could have significant community benefits.
6. The government announcement on the 14<sup>th</sup> December 2011 to provide the £ 102m funding for the North Fringe to Hengrove Rapid Transit Package will provide improved opportunities for interchange with the 309/310 service at Aztec West

7. We reviewed the six option sites for the draft Core Strategy and their relationship to the 309/310 service, as shown on Figure 3 attached. The Council's recommended option is Site 6, Park Farm; Morton Way South is Site 3.
8. Although First have not been asked by the Council to provide a formal view on the draft Core Strategy proposals, you considered that Morton Way South site would be a preferred development option, as there would be no costs associated with extending the service or for timetable or infrastructure changes.

I trust I have noted our discussion correctly.

Regards

**Patrick Gurner**  
**Director**  
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