

## **Bristol City Council**

### **Further Representation to the South Gloucestershire Core Strategy**

#### **Matter 22: Communities of the North Fringe**

- Q.1 Is it feasible to accommodate the scale of development envisaged in the North Fringe areas without increasing levels of congestion?**
- 1.1 In its statement relating to Matter 9, Filton Airfield, Question 2, the City Council highlights particular concerns regarding the inadequacy of modelling evidence to assess the impact of additional development in the Filton/Cribbs/Patchway area. Given the existing serious congestion levels on routes in this part of the North Fringe it is vital that development proposals are properly matched to mitigation measures in this area.
- 1.2 The Council believes that the current development package proposed for the Cribbs/Patchway neighbourhood is likely to impose further, unacceptable impacts on local and strategic routes and that developer contributions could be inadequate to fund necessary infrastructure improvements. In addition, options to improve the highway network to mitigate the impacts of significant increases in traffic are limited.
- 1.3 In the absence of any viability evidence, it is suggested that a precautionary approach should be adopted in setting the scale of development. The Council's statement relating to Matter 9 recommends that this be achieved through rebalancing land uses by:
- Not permitting further retail growth at The Mall
  - Reducing housing levels at Haw Wood and the Airfield by about 1,600 dwellings
  - Allocating an additional 20 Ha. of land, primarily for aerospace use - above the 50 Ha. recommended by SGC.
- 1.4 Bristol City Council has a number of significant concerns relating to any further retail expansion at Cribbs Causeway. The following paragraphs focus specifically on the transport implications of this proposal. They draw on a number of reports prepared by Atkins for SGC and, particularly, the Transport Forecasting Report (RD44), only recently made available.
- 1.5 The Council opposes further retail development at Cribbs Causeway on transport grounds as the current transport network serving the area is already at capacity in places during busy periods. Even without additional retail development, improvements will be required to the network to accommodate expected increases in traffic levels.

- 1.6 Additional traffic along these already congested corridors will result in a range of negative impacts such as:
- Increased congestion on the A4018 and A38 corridors
  - Increased unreliability of public transport services
  - Unacceptable diversionary effects on inappropriate routes
  - Degradation of the public realm as more roads take higher levels of traffic
  - Less attractive environment for pedestrians and cyclists
  - Greatly reduced resilience of the network to cope with unexpected incidents - both on local roads and the motorway network.
- 1.7 SGC has made only limited information available on transport assessment and impacts. The City Council has serious concerns as to the adequacy and robustness of the assessment of the transport impacts undertaken so far to support the proposals. It questions whether data used to forecast the likely rise in trips is adequate. The overall rise forecast for the North Fringe area does not offer the necessary geographical detail, as trips are likely to be loaded at sensitive parts of the network, rather than spread evenly across the area.
- 1.8 Further details of Bristol's transport network serving Cribbs Causeway, and of the likely impacts of additional traffic, are set out in Appendix 1 of this statement.

**Q.2 Is there scope to utilise Filton Airfield to improve traffic flows in the North Bristol Area?**

- 2.1 The Council welcomes most aspects of the approach to access and transport recommended by SGC in policy CS26 of the Post - Submission Changes. In particular it supports the analysis at paragraph 12.15 that:
- “The area currently suffers from congestion and a car-dominated environment. The transformation of the area will be contingent upon the creation of a high quality public realm that prioritises pedestrians, cyclists and public transport over private cars. This will provide the opportunity to reintroduce passenger services on the Hallen Line/Henbury Loop and reopen or provide new stations. The North Fringe to Hengrove Rapid Transit will form a new public transport link through the area serving nearby concentrations of employment and commercial uses and the greater Bristol area to the south. The opportunity for innovative transport solutions within and around the area will be encouraged.”*
- 2.2 The above approach paints an ambitious picture of a neighbourhood shaped to meet new challenges and expectations: part of a low carbon future. The car is seen, rightly, as having a limited role within an overall

transport strategy: a necessity if innovative transport solutions are to be successfully introduced.

- 2.3 Car access to the Airfield and its surroundings will be necessary for the area to function. However, the use of Airfield land to accommodate through traffic would be a retrograde step, ignoring the evidence that building more roads simply attracts more “induced” traffic. It would undermine the positive environmental objectives which SGC is promoting and add to the concerns of nearby Bristol communities which are already experiencing the negative effects of noise, traffic hazards and congestion.
- 2.4 The City Council strongly supports an approach to transport and access within and adjacent to the Airfield which favours non-car modes and accommodates essential car access in a form which has low impacts and does not accommodate through traffic. In addition, it supports the use of much of the Airfield land, at its eastern end, as a focus for aerospace related employment. Construction of new road infrastructure here could reduce the land available for this purpose.
- 2.5 The following change to the penultimate paragraph of the second page of Policy CS26 is recommended, to ensure that the aim of avoiding a car dominated environment is embedded in the proposals for the Neighbourhood:

**“An integrated and comprehensive approach to access and transport, including significant improvements to pedestrian and cycle networks, and public transport, including the re-introduction of passenger rail services, and local road networks across and beyond the area, including Junction 17 of the M5 together with management of transport impacts on M5 Junction 17 and the local road network. Access to the new neighbourhood area will be designed to avoid through traffic movements.”**

- Q.3 Is the possible identification of a major sports facility in this area a good use of urban land or are there alternative locations better suited for this purpose?
- 3.1 The City Council has no comments on this matter.
- Q.4 Is there sufficient flexibility in phasing arrangements to ensure housing can be brought forward on other sites in the North Fringe if those being developed are not completed to schedule?
- 4.1 The City Council has no comments on this matter.

**Q.5 Should policy CS26 be revised to reduce complexity and, if so, how could this be achieved?**

5.1 There is no doubt that Policy CS26 would benefit from a reduction in length and detail. The City Council has previously submitted recommendations for its amendment in its comments on the Post-Submission Changes document. For convenience, these are attached as Appendix 2 to this statement.

**Q.6 Is it realistic to expect the range and type of facilities required can be provided as part of the Cribbs/Patchway New Neighbourhood?**

6.1 The City Council has set out its concerns in relation to this issue in its statement on Matter 9: Filton Airfield. These relate to the costs of new infrastructure - particularly transport improvements –and the possible adverse effects on the viability of development at Cribbs/ Patchway. It is recommended that further work be carried out to clarify this relationship, including testing less intensive development options which might require less mitigation of their impacts.

**Q.7 Development of the new neighbourhood East of Harry Stoke is predicated on the provision of the Stoke Gifford Transport Link. What implications does this have for delivery of the CS should the link be delayed through lack of funding or for other reasons?**

7.1 The City Council has no comments on this matter.

**Q.8 Are the proposals for revised Green Belt boundaries both to the west of A4018 and as part of the East of Harry Stoke New Neighbourhood appropriate?**

8.1 The City Council has no comment regarding the revised Green Belt boundary East of Harry Stoke.

8.2 With regard to the revised Green Belt boundary to the west of the A4018, the Council has previously submitted a response to consultation on the Post-Submission Changes, relating to Haw Wood, which should be noted. In addition, a separate further submission has been made in respect of Matter 6: Green Belt. This highlights changes of emphasis in favour of protecting Green Belt, within the NPPF.

8.3 The Council remains concerned that an area which is acknowledged within SGC's updated Strategic Green Belt Assessment, dated December 2011 (PS7), as fulfilling all the purposes of the Green Belt should not be protected from development. The exceptional circumstances which have been provided to justify development of the land west of the A4018 can be summarised as:

By releasing this land from the Green Belt, SGC has used Green Belt policy to ensure that the development strategy of the Core Strategy is delivered. This approach to the Green Belt will ensure that:

- development takes place in the most sustainable locations;
- development proposals elsewhere which could undermine the development strategy can be resisted; and
- the purposes of the Bristol and Bath Green Belt continue to be delivered

8.4 The above justification is unsatisfactory for the following reasons:

- Clearly, the purposes of the Bristol and Bath Green Belt will not continue to be delivered in the area west of the A4018
- The development strategy for the Cribbs/Patchway area overstates the benefits of development west of the A4018. This area is relatively isolated from the Cribbs area to the east by the busy dual carriageway: access to the east side of the A4018 will be hazardous.
- The development will be car dependent and too small to support its own local services.
- Development will involve a loss of significant areas of playing fields.
- The Strategic Green Belt Assessment is flawed as an assessment tool by virtue of not being accompanied by complementary work to assess the development options of locations outside the Green Belt.

### **Concluding comments**

9.1 The Inspector is requested to consider the above statement and its appendices in conjunction with related statements and earlier submissions as referenced in the text.

## **Appendix 1**

### **Bristol's transport network serving Cribbs Causeway**

#### **A. Current transport network serving Cribbs Causeway**

The main road connections between Cribbs Causeway and Bristol are via the A4018 and the A38. These routes are currently heavily congested in places during peak times. Due to the nature of shopping trips, peak times on these routes include Saturdays as well as weekday peaks.

Congestion on these routes increases journey times, encourages traffic to find alternative less appropriate routes, and impacts on bus reliability. These negative impacts filter down through the network, even from more localised congestion around Cribbs Causeway, outside of the Bristol boundary. The sensitivity of these key roads also makes them less resilient to unexpected increases in traffic, such as when an incident on the motorway network causes traffic to divert onto local roads.

The area around Westbury-on-Trym, along the A4018 Falcondale Road suffers particularly badly from congestion at peak times. There are four traffic signal junctions that manage flows on and across the corridor in the Westbury-on-Trym area. The junctions with Stoke Lane and Henbury Road are particularly problematic, as they are currently operating close to capacity during peak times. Bristol City Council is currently examining options to improve these junctions, but sufficient capacity is unlikely to be achievable to cope with significant increases in traffic levels.

BCC has undertaken some high-level modelling work, using the GBATs transport model (used to support the West of England major transport schemes programme). This work suggests that a significant proportion of traffic heading for Cribbs Causeway originates on Bristol's roads. For example, the model suggests that 22% of trips to Cribbs Causeway during the morning peak use the A4018, rising to 26% between 10.00-16.00. Similar proportions are shown entering via the A38, with a significant amount of this traffic likely to have originated from Bristol. It should be noted that this work is at a high level and more detailed data would need to be collected around Cribbs Causeway to give greater confidence to the outputs. However, traffic data collected along the A4018 close to the Bristol / South Gloucestershire boundary appears to support this, as peak flows are observed on Saturday mornings heading towards Cribbs Causeway and on Saturday afternoons coming away from it. This suggests a high proportion of shopping trips.

Cribbs Causeway has a very generous provision of free car parking, making it particularly attractive for car trips. The main car park at The Mall has over 7,000 spaces available, with a number of smaller car parks also available. The car parks rarely operate at capacity, other than during particularly busy shopping times. Any expansion in retail therefore has the potential to attract additional car trips even without any increase in car parking. Parking could be

influenced through a charging mechanism, but this would have to be carefully managed to ensure it does not increase parking turnover and, therefore, the number of car trips.

## **B. Future transport trends without Cribbs Causeway retail expansion**

BCC's GBATs transport modelling work suggests that background traffic growth will be in the region of 8% up to 2016 and 23% up to 2026, assuming that the West of England's major transport schemes are delivered and forecast growth in housing and employment is achieved. With 5,700 new dwellings proposed in the Cribbs/Patchway New Neighbourhood area, the road network serving this area is likely to become even more congested.

The new Bristol Zoo attraction, the National Wildlife Conservation Park, which now has full planning permission, is expected to open over the next couple of years close to junction 17 of the M5, opposite Cribbs Causeway. This is likely to be a major trip generator and is expected to generate a significant number of car trips, which will put even greater pressure on the network.

Key routes linking the North Fringe to Bristol, such as the A4018 and the A38 are likely to become more heavily congested at peak times, with peaks also spreading to accommodate additional traffic. Mitigation measures to accommodate these increases are likely to include improvements to junctions and further public transport priority measures. Given that some junctions along these routes are already operating close to capacity, it is likely that the impacts of additional traffic will spread wider, through other areas including the suburbs of Southmead, Clifton, Shirehampton, and onto the motorway network, as drivers search for alternative routes.

## **C. Transport impacts with Cribbs Causeway retail expansion**

BCC would expect a net increase in retail trips coming from Bristol associated with any increase in retail floorspace at Cribbs Causeway. It is difficult to predict the likely levels of car traffic increase as this will be dependent on a number of factors, such as economic trends, the type of retailing provided, the availability and cost of parking, and the journey time reliability for travelling to The Mall.

It is hoped that a greater proportion of trips can be made by non-car modes in the future as more housing is developed within walking and cycling distance of Cribbs Causeway. However, these are more likely to be new trips, not currently being made, and are unlikely to reduce overall car trips on the road network. Assessment work published by SGC suggests an overall 10% increase in car trips (source: RD44, Chapter 6, 4<sup>th</sup> paragraph).

Further increases in traffic will exacerbate the problems described above with an already saturated network struggling to cope at peak times. There is a limit to the effectiveness of mitigation measures when the network reaches

capacity so the Council has serious concerns regarding whether key parts of Bristol's road network could cope with significant increases in traffic levels.

BCC believes that the increased traffic that retail expansion at Cribbs Causeway will give rise to an unacceptable impact on the highway network. It therefore opposes the growth proposals for The Mall on transport grounds.

## **Appendix 2**

### **Recommendations to amend Policy CS26**

Amend policy to reflect reduced housing capacity - from 5,700 to 4,100 at Cribbs/Patchway New Neighbourhood

Amend paragraph on second page of the policy, which begins "Cribbs Causeway..." by deleting "...for future designation as a sub-regional centre, conditional upon the measures set out below and in Policy CS14".

Amend paragraph on third page of the policy, which begins "The masterplan for the new neighbourhood..." by deleting "...and its subsequent recognition as a sub-regional centre..."

Paragraph 12.13

Amend by deleting "...a new sub-regional centre to form a focus for the surrounding area.."