

WEST OF ENGLAND

----- "BUILDING OUR FUTURE" -----

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West of England Joint Spatial Plan - Publication Representation Form

**The four separate comments submitted by STN as a response to the Joint Spatial Plan have been collated below*

Sustainable Transport Network: who we are

The Sustainable Transport Network (STN) is a group of Bristol Green Capital Partnership member organisations that advocate for sustainable transport in Bristol and the wider region. The STN collectively produced the [Good Transport Plan](#) for Bristol in 2016, which offers a vision of an integrated and sustainable transport network that could be shared by all.

All 800+ Bristol Green Capital Partnership member organisations share a vision of a sustainable Bristol with a high quality of life for all. A key Partnership value is collaboration - bringing organisations and people together to share ideas and achieve change.

1) Too much weight has been given to protection of the Green Belt

In trying to meet the twin aims of protecting the Green Belt and reducing the need to travel by non-sustainable transport modes, too much weight has been given to the protection of the Green Belt compared to ensuring the availability of sustainable transport options.

The JSP (in Topic Paper 2, 3.9) acknowledges that “seeking to avoid the Green Belt entirely would result in a strategy which “would severely compromise the Plan’s Strategic Priorities”. The JSP (main document, 3.19) says similarly: “Such a strategy would be dependent on some highly unsustainable locations that are very difficult and expensive to mitigate with only sub-optimal solutions. It would also put pressure to locate development in the flood risk areas.” It goes on to say JSP (main document, 3.20) “However, due to the scale of provision required and the extensive nature of the Green Belt, the Plan does include some Strategic Development Locations currently with Green Belt designation ...”

However, although the JSP allocates over 6,000 new homes within the Green Belt, it also allocates more than 6,000 new homes in unsustainable locations beyond the Green Belt. 6,000 may be a relatively small proportion of the total requirement, but it sets a precedent for future expansion at these unsustainable sites. Development at such sites unnecessarily generates more traffic and adds to environmental problems such as poor air quality, with their associated economic and health costs, severely compromising the Plan’s Strategic Priorities – in particular Strategic Priority 3 “To deliver a spatial strategy which ... ensures that new development is properly aligned with infrastructure and maximises opportunities for sustainable and active travel. ... “

The Plan’s choice of Strategic Development Locations (SDLs) strikes a sub-optimal balance between the twin aims of protecting the Green Belt and reducing the need to travel by non-sustainable transport modes. The Plan does not adequately justify that its choice of SDLs is the best way to meet the Strategic Priorities, and is therefore *unsound*.

What is needed is a systematic review of the Green Belt, something that was advocated by a number of respondents to the earlier consultations. Without a systematic review of the Green Belt, the choice of SDLs is unsound.

2) Some locations have been chosen to help justify the case for upgrading the transport infrastructure, which does not follow from the JSP's strategic priorities

The 2016 JSP ("Towards the Emerging Spatial Strategy", Table 1) openly stated that some Strategic Development Locations (SDLs), including all the SDLs beyond the Green Belt, have been chosen to help justify the case for upgrading the transport infrastructure. The Publication document excludes such statements, but the SDL choices are almost unchanged and the rationale remains.

Such a rationale is 'cart-before-horse'. It does not seem to follow from the JSP's four critical issues and strategic priorities, and is arguably unsound. The expenditure on transport infrastructure is more than it would need to be to support a more sustainable choice of SDLs, and the expenditure on road projects is more than it need be.

There is £3.1bn planned expenditure on roads. This might be only a third of the planned expenditure, but it is a very large amount to be spending to support non-sustainable modes of transport. In particular, there is £1.4bn proposed expenditure along the route of a strategic road link from the M4 north-east of Bristol to Weston-super-Mare via the east side of Bristol is route alone.

There is a real question as to whether road-building makes congestion worse, principally by inducing new motor journeys, merely moving traffic from one bottleneck to another, or ameliorates it. This needs to be considered in detail in relation to each proposed road scheme. It is beyond our expertise to perform such analysis, but it needs to be undertaken to avoid considerable expenditure on inappropriate road schemes.

Traffic models underestimate "induced demand" (Essential Evidence by Dr Adrian Davis)². By exaggerating the economic benefits of road capacity increase and underestimating its negative effects, omission of induced traffic can result in over-allocation of public money on road construction, and correspondingly less focus on other ways of dealing with congestion and environmental problems in urban areas (Naess et al, 2012)³.

Any induced increase in traffic from road-building adds to environmental problems such as poor air quality, with their associated economic and health costs, thus compromising the Plan's Strategic Priorities and leading to a sub-optimal choice of SDLs.

In summary, it is *unsound* to choose SDLs to help justify the case for upgrading the transport infrastructure.

3) The match between the development areas and employment locations has not been demonstrated

The JSP (in Employment Topic paper 3, 5.1) describes one of the employment aims as to "... improve accessibility to jobs". The JSP (main document, 2.9 Figure 3) describes Strategic Priority 3 "To deliver a spatial strategy which ... ensures that new development is properly aligned with infrastructure and maximises opportunities for sustainable and active travel. ... "

The JSP (main document, 4.26) says "The overall strategy is to focus growth in City Centres and EZs which are sustainable locations and are successful business locations." Apart from this, the JSP

contains no analysis to demonstrate that the match between the development areas and employment location minimises the need to travel as much as it could do. In this way, the Plan does not adequately justify that it is the best way to meet the Strategic Priorities, and is therefore *unsound*.

4) There is no commitment to transport project sequencing and prioritisation to align with strategic development plans, nor a mechanism for reviewing the Strategic Development Locations (SDLs) should the feasibility or projected effectiveness of the transport schemes change.

The JSP (in the Joint Transport Study, 13.3.2) says, "It will be particularly important to ensure effective alignment of the delivery of the Strategic Development Locations, with new infrastructure required to ensure that effective travel choices are in place from an early stage of development being occupied." It is one thing to recognise the importance, another to ensure it happens. The JSP contains no commitment to ensure this happens.

Project sequencing and prioritisation are very important. This should be based on what needs to happen first so as to align with strategic development plans, and not reactive to where there is funding available. Sustainable transport and active travel measures should be prioritised as they help to reduce congestion, improve the flow of people, address air quality issues and improve public health. This is in line with the JSP strategic priorities.

In particular, walking, cycling and public transport schemes should be prioritised over road schemes that encourage private car use and lead to congestion and poor air quality. At the very least the active mode schemes should be commenced at the same time as the inactive modes, and planned alongside them, not fitted in as afterthoughts. The JTS (13.4) refers to the development of an Infrastructure Delivery Plan, and the JSP (Policy 6) refers to a "WoE Joint Infrastructure Delivery Programme", but little about its content or timing or ongoing management. Policy 6 says "Priority will be given to schemes which support the delivery of the spatial strategy as set out in Policy 2.", but this is insufficient.

It is inevitable that there can be no assurance at this stage that the necessary transport improvements will happen in time, or will be achievable/ affordable, technically or politically, or that funds will be available. Moreover, the effectiveness of the proposed new transport initiatives to support the less sustainable SDLs has not yet been demonstrated.

Without a commitment to project sequencing and prioritisation, based on what needs to happen first so as to align with strategic development plans, the JSP has not demonstrated it is *effective*, and is therefore *unsound*.

Without a mechanism that would trigger a review of the SDLs, should the feasibility or projected effectiveness of the transport schemes change, the JSP has not demonstrated it is *effective*, and is therefore *unsound*.