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Comment ID [13763649/2](#)

Respondent [North Bristol SusCom Ltd \(Mrs....](#)

Response Date [03 Jan 2019](#)

Comment North Bristol SusCom is a group of leading employers working together to reduce congestion and support the development of a fully integrated, sustainable transport network for North Bristol. We know that combatting traffic congestion and increasing the viability of walking, cycling and public transport is vital for the long-term prosperity of our businesses and the health and well-being of our 45,000+ staff and 30,000 students.

WED 007 – Transport Topic Paper 8

- ▶ We are pleased to see that the G-BATS4 model has been adjusted to reflect the impact of the removal of the Severn Tolls.
- ▶ However, we are disappointed that the lower range (12%) of the expected increase (between 12% and 24%) was selected rather than a middle or higher range. We would expect the UAs to review the impact of the toll removal in the first few months of 2019 and re-run the figures should the 12% prove to have been too conservative.
- ▶ We appreciate that this is an examination of the JSP and that the transport measures being focused on are those that relate to the SPD sites and mitigating the traffic they will generate. However, the package of measures in the Joint Transport Study and the emerging Joint Local Transport Plan 4 also includes a significant number of projects that address the current transport infrastructure deficits within the wider West of England area. We would argue that these are also vital for the SPD sites as without those measures being put in place the SPD

generated trips will be very constrained when trying to join the existing transport networks unless those improvements are also made.

- ▶ The existing Joint Transport Study and emerging JLTP4 have not identified specific measures to mitigate the impact the removal of the Severn Tolls will have on the transport network. Once the modelling work has been carried out by Highways England the various plans will need updating to include specific mitigation measures.
- ▶ Maximising attractiveness of rail and bus use to existing/future car users will be challenging without some way to address costs. Rail costs, in particular, continue to rise every year whilst fuel duty freezes (and removal of tolls on the Severn Bridge) make it often much cheaper to drive. Policy measures like a bus to work and train to work schemes, where people can purchase season tickets through salary sacrifice, should be pursued to help enable more people to get out of their cars.

WED 008 – Emerging Findings Transport Report

Our concerns remain that many of the proposed SPD locations (those that jump the green belt) are not sustainable in transport terms and the transport mitigations suggested will not be enough to make them sustainable.

We are also concerned that the proposals are all still focussed on capital investment required without any consideration or reference to the need for behaviour change activity. Greater clarity on how behaviour change activity will be used to encourage greater sustainable transport take up in the SPDs is required. It is well known that a point of transition (moving house, starting a new job, changing school) is an opportunity to influence behaviour. Therefore it is absolutely essential that clear plans are included to help people transition to non-car based transport – some revenue funding is required to deliver behaviour change activity – similar to what is being delivered through the current access west programme but on a much larger scale.

Again the capital investments are based primarily on road schemes with some public transport improvements - active

transport in some cases is missing completely or allocated very minimal amounts of funding.

Specific SPD comments:

A: South East Bristol and Whitchurch - Proposes a total investment of between £224 -244 million. Of this £0.3 million is allocated to active travel. Why is there no proposed A37 cycle corridor linking the SPD with the City Centre?

B: Keynsham - All road based investment with no confirmed bus connectivity to the SPD.

E: Banwell & Churchill - Again all road based investment for 4,575 new dwellings. Any future bus links will be focused on connection to WSM but no funding allocated to ensure such provision is delivered.

F: Thornbury, Buckover and Charfield - Very disappointed that the A38 strategic cycle routes and metrobus routes are now proposed to no longer go down the A38 into Filton (a major employment location). We know the A38 is one of the busiest cycling corridors and major employers in the area like Rolls Royce and Airbus have 20% of staff cycling regularly to work without any dedicated on road cycling infrastructure.

Not enough investment planned to mitigate the increase in people commuting between the SPDs and the City Centre. Very unsustainable. A 100 space park and ride is simply too small.

G: M32 Corridor - Whilst we agree that a Park & Ride is needed on this corridor we believe that the location for the Park & Ride should be closer to the M4 Corridor (north of Junction 1 or north of Junction 19) so that it cannot only intercept cars heading into Bristol but also into the North Fringe which also suffers huge congestion. Given the huge problems the Council faced with the Metrobus bridge being built on Blue Finger Soil the only option proposed seems highly contentious and likely to face huge public opposition.

Has any work been done to look at providing the 1800 spaces across a number of smaller sites targeting people commuting from specific directions/locations?

J: Weston Super Mare - No plans shown for Active Travel – a strategic walking and cycling network?

WED 009A

The sustainability appraisal reiterates our earlier concerns that far greater weight was given to the protection of the green belt (Scenario 1) over transport focussed development (Scenario 3) despite Scenario 3 being the most likely to have the most positive effects (para 5.17).

Ann O'Driscoll, Director, North Bristol SusCom

Attachments