

## **The Sustainable Transport Network's response to the Joint Spatial Plan - Technical Evidence Work Consultation, November 2018**

**STN: who we are:** The Sustainable Transport Network (STN) is a subgroup of Bristol Green Capital Partnership member organisations that advocates for sustainable transport in Bristol and the wider region. BGCP has 850+ member organisations.

### **Our response:**

#### 1 Introduction

The new information helps to make the assessment of options more transparent, which is helpful.

STN submitted comments in January 2018 to the draft JSP, now under examination. This response to the publication of further JSP documents considers to what extent the additional JSP information addresses the points that STN has made. We consider the four parts of the STN submission to the JSP examination one by one below. For each of the four parts, we ask:

- **Does the new JSP information address the point we are making ?**

In each case, we consider that the new information supports the points we are making, and does nothing to contradict them.

- **Is the additional evidence in the consultation documents valid ?**

We have a comment to make on the Consolidated Sustainability Appraisal. We do not make any comments on any of the other consultation documents.

We will make comments later on the proposals that are made in the two transport documents (WED 007 - Transport Topic Paper 8 and WED 008 - Emerging Findings Transport Report). There are comments which we will make when we comment on the Joint Local Transport Plan for which consultation is due to open in February. These comments are not critical to our comments on the JSP, and it is more efficient to make the transport-related comments in one go. For the moment, we wish to register that we do not agree with all the proposals in the two transport-related JSP documents.

#### 2 The response

[starting on the next page]

Point made by STN on the JSP (abbreviated)								
<p><b>Too much weight has been given to protection of the Green Belt.</b> 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. What is needed is a systematic review of the Green Belt.</p>	<p><b>Does the new JSP information address the point ?</b>  <b>The additional information supports the point made.</b></p> <p>1) The Consolidated Sustainability Appraisal non-Technical Summary (WED 009A) demonstrates that <b>the chosen balance of scenarios 1 and 3 is sub-optimal</b> against sustainability criteria. Scenario 3 on its own scores better. Quoting 5.17: <i>“As shown in Table 5.2, ... Scenario 2: Concentration at Bristol urban area and Scenario 3: Transport focussed are likely to have the most positive effects because they include strategic development locations that are well related to Bristol and the larger settlements in the plan area and/or sustainable transport links. Therefore, there would be better access to a range of existing services, facilities and employment opportunities that would reduce the need to travel by car.”</i></p> <p>2) The Strategic Development Locations have been chosen on the basis of the chosen twin scenarios. It follows that the <b>chosen SDLs are also sub-optimal</b> against sustainability criteria.</p> <p>3) The 12 papers “Justification of the requirements for the 12 Strategic Development Locations in Policy 7-7.12” <b>do not provide new reasons for the choice of SDLs</b>; they merely expand on reasons already given.</p>							
<p><b>Comments on the Consolidated Sustainability Appraisal consultation document</b></p>								
<p>For some key Sustainability Assessment objectives, the assessment is as follows (taken from table 5.2):</p>								
<p><b>SA objective</b></p>	<p>1a Access to open space</p>	<p>1b Impact on air quality</p>	<p>2e Access to town centre facilities</p>	<p>3b Access to major employment area</p>	<p>4c Valued landscapes</p>	<p>5a Access to sustainable transport</p>	<p>5b Reduce energy and emissions</p>	<p><b>Scenario</b></p>
<p>Scenario 1 – protect green belt</p>	<p>+/-</p>	<p>+/-</p>	<p>+/-</p>	<p>+/-</p>	<p>+/-- ?</p>	<p>+/-</p>	<p>+ ?</p>	
<p>Scenario 3 – transport focus</p>	<p>+</p>	<p>+/-</p>	<p>+</p>	<p>+/-</p>	<p>-- ?</p>	<p>+/--</p>	<p>+ ?</p>	
<p>1) <b>The equal ratings for 1b air quality are questionable.</b> For Scenario 1, the positive element relies on residents of outlying SDLs using public transport, which is questionable. In contrast, the negative element of Scenario 3 relies on residents of edge-of-Bristol SDLs exacerbating air quality in Bristol, even though they have better access to public transport. (Taken from SA Appendix 6 of the Consolidated Sustainability Appraisal).</p> <p>2) <b>The positive rating of Scenario 1 for 5b energy and emissions is questionable.</b> It relies on local low carbon energy projects at the SDLs. All five scenarios are rated the same except Scenario 4 where the spread of smaller development locations is deemed to provide less opportunity for such energy projects. The assessment seems to take no account of transport energy consumed and emissions produced, but it should do so.</p>								

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<p><b>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.</b> The expenditure on transport infrastructure, particularly roads, is more than it would need to be to support a more sustainable choice of SDLs.</p>	<p><b>Does the new JSP information address the point ?</b></p>																											
	<p>The additional information supports the point made.</p> <p>The Transport Topic Paper 8 (WED 007) demonstrates how many car trips will be generated by the less sustainable SDLs (table 3-5), and the forecast traffic flow differences (figures 3-5, 3-6, 3-7). The additional car trips will add to emissions, increase congestion, and necessitate more road-building. The cost of the required mitigation measures for some of the SDLs (taken from table 4-2) is as follows. It illustrates the point that <b>expenditure on roads is more than it would need to be to support a more sustainable choice of SDLs.</b> The expenditure to support these SDLs would not be justified if those places were not chosen as SDLs..</p> <table border="1" data-bbox="745 536 1632 826"> <thead> <tr> <th>SDL</th> <th>Mitigation cost</th> <th>New dwellings</th> </tr> </thead> <tbody> <tr> <td>Bristol Urban Area</td> <td>£232-351m</td> <td>12000</td> </tr> <tr> <td>Thornbury, Buckover, Charfield</td> <td>£95-104m</td> <td>3200</td> </tr> <tr> <td>SE Bristol and Whitchurch</td> <td>£229-254m</td> <td>2360</td> </tr> <tr> <td>Keynsham</td> <td>£30-64m</td> <td>1400</td> </tr> <tr> <td>Yate and Coalpit Heath</td> <td>£165-175m</td> <td>4000</td> </tr> <tr> <td>Nailsea and Backwell</td> <td>£168m</td> <td>3275</td> </tr> <tr> <td>Banwell and Churchill</td> <td>£180-185m</td> <td>4575</td> </tr> <tr> <td>Weston-super-Mare</td> <td>£43-83m</td> <td>-</td> </tr> </tbody> </table>	SDL	Mitigation cost	New dwellings	Bristol Urban Area	£232-351m	12000	Thornbury, Buckover, Charfield	£95-104m	3200	SE Bristol and Whitchurch	£229-254m	2360	Keynsham	£30-64m	1400	Yate and Coalpit Heath	£165-175m	4000	Nailsea and Backwell	£168m	3275	Banwell and Churchill	£180-185m	4575	Weston-super-Mare	£43-83m	-
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<p><b>The match between the development areas and employment locations has not been demonstrated.</b> 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.</p>	<p><b>Does the new JSP information address the point ?</b></p>																											
	<p>None of the additional information addresses this point.</p> <p>The paper Updated Employment Evidence (WED 006) analyses the balance of supply and demand for employment land supply and demand at the aggregate level across the region, not by location. It does not consider the trips generated by the location of employment.</p>																											
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<p><b>There is no commitment to transport project sequencing and prioritisation to align with strategic development plans, nor a mechanism for reviewing the SDLs should the feasibility or projected effectiveness of the transport schemes change.</b></p>	<p><b>Does the new JSP information address the point ?</b></p>																											
	<p>None of the additional information addresses this point.</p> <p>The paper Emerging Findings Transport Report (WED 008) explores the options for transport improvement projects, mostly roads. It provides greater definition and cost assessment of the road investment needed on the corridors "serving the Strategic Development Locations (SDLs), which will generate large travel demands on the corridors".</p>																											
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