



Joint Local Transport Plan 4 Consultation

February/March 2019

Business West Chambers of Commerce & Initiative Submission

Introduction

1. Business West Chambers of Commerce & Initiative is the main business representation and leadership organisation for the West of England. We have been working on behalf of businesses in the region for nearly 200 years and now represent nearly 22,000 businesses, from new start companies through to the major private and public employers. We are also members of the board of the West of England's Local Enterprise Partnership. This submission has also been strengthened from additional informed input from the Bristol Property Agents Association (BPAA).
2. As a Chamber of Commerce, we are not representing any specific business interests or sector, but are submitting evidence based on our independent view of the long term economic interests of the region and the whole spectrum of businesses who operate here.
3. We recognise the fundamental importance of long term planning and the direct connection between transport planning and housing supply, employment land, sustainable economic growth and strong communities.
4. We have long encouraged the West of England authorities to plan ambitiously for the long-term future in terms of housing, transport and employment. We very much welcomed both the Joint Spatial Plan (JSP) and Joint Transport Study (JTS) and the close working of the West of England authorities that underpins them. We believe this is vital in order to successfully plan our future housing supply and secure our future economic growth needs.
5. We have made detailed submissions in response to the West of England local authorities' JSP and to the additional JSP Technical Evidence that was consulted upon recently.
6. At the time of the most recent JSP consultation, we found it difficult to understand the overall transport proposals set out in the supporting Technical Evidence documents because of the absence of an overall transport plan for the West of England. In light of that difficulty, we welcome

the consultation on the Draft Joint Local Transport Plan 4 (DJLTP4), which provides that missing central piece of the West of England transport strategy.

7. We are broadly supportive of the transport strategy set out in the DJLTP4. In particular, we welcome its focus on facilitating and encouraging movement by walking, cycling and public transport. However, we are concerned that the draft document presents a strategy not a plan because it lacks specific proposals that are ready to take forward in funding bids and to delivery. BW encourages the LAs to quickly conduct the studies needed to transform the draft JLTP4 into a Plan that includes projects that can be delivered in the next five to ten years.
8. From a business perspective, we believe that car and goods vehicle use will continue to be significant for the duration of the plan period, so many routes are expected to remain congested in peak periods. We take a pragmatic approach to this and consider that the key to enabling continued growth in the West of England will be through increases in travel by walking, cycling and public transport alongside interventions to reduce congestion in key parts of the transport network.
9. We note and welcome the considerable increases achieved in the last two decades in travel by all three modes. However, while walking and cycling proportions are high in comparison with contemporary cities, bus use remains below contemporary cities (see DJLTP4 Appendix 2 P153). Hence, we consider that the greatest potential to achieve further growth will be through improvements in public transport, achievable through enhancements in bus service coverage and frequency on new and prioritised routes, coupled with the transformational change that would come through introduction of new rail-based mass transit routes.
10. We set out our primary concerns with the JLTP4 below.
11. One concern is regarding the package of transport investments to serve South Bristol – a part of the city region suffering from significant connectivity issues, which are having a negative impact on private sector investment and wider labour market functioning. For this reason, we see the completion of the South Bristol Orbital Link as a particularly high priority because of its potential to improve access to south Bristol, to make it more attractive to employers. Along with other packages, notably the M4 Junction 18A and Link to the A4174 Ring Road, it would also serve to attract cross city traffic away from the city centre and provide an alternative route to improve resilience when the M5 is congested or blocked. We would like this prioritised because we consider that it could unlock much needed employment land within the city region with tailored additional investment packages.
12. A further concern relates to the Avonmouth/Sevenside Employment Area, which we have highlighted on numerous occasions, because we consider that DJLTP4 proposes inadequate measures for sustainable travel to work. We are aware from existing employers that recruitment in the area has become increasingly difficult as development has increased in the Sevenside area, accentuated by the lack of public transport provision. A Metrobus route is proposed to link Bristol city centre to Avonmouth but connections between Sevenside and Bristol's North Fringe, where much housing growth is planned, are overlooked. At present the JSP plans to allocate 80% of future industrial land allocations in Avonmouth and Sevenside – without a detailed plan for a significant package of future transport investment this cannot be considered sound, sustainable or spatially balanced.

13. An additional concern is the missing element within the JLTP4 of a focus on behavioural change. We welcome above JLTP4's ambitions for a modal shift towards walking, cycling and public transport, but are concerned that there is no plan being developed, nor funding allocated, for a comprehensive programme of behaviour change activity throughout the duration of the JLTP4. Behaviour Change activity would be highly costs effective way of targeting those who have shorter journeys and alternatives to the car to take them and should be included.
14. Another concern is not with DJLTP4 per se but with the components that are included to mitigate the transport impacts of selected Strategic Development Locations (SDLs) in the JSP, which we do not consider to be sustainable locations for development of housing or employment and which we consider should be removed from the JSP. Development in these locations will generate disproportionately high proportions of new vehicle trips and require expensive mitigation measures. This concern relates particularly to the SDLs 'beyond the Green Belt', where mitigation costs are unreasonably high whilst car journeys generated are significant. These should be replaced by urban extension SDLs closer to existing established employment areas from which more people will choose to travel by sustainable means and the cost of the necessary transport infrastructure will be lower. An extract from our January 2019 submission on this issue to the recent JSP Technical Document consultation is provided as Appendix A to this document.
15. A further main concern relates to how the funding gap might be bridged. We fully support the ambitious proposals set out in DJLTP4, which aim to mitigate both the legacy of under-investment in transport infrastructure and to facilitate future growth by mitigating the impacts of the planned development. Against this background, we accept that new funding streams will be necessary. Of the two new sources of local funding considered in DJLTP4, we remain fundamentally opposed to the introduction of a Workplace Parking Levy (WPL) because it would not charge all who travel in personal motorised transport on the road network and would inequitably penalise business travel. We have been consistent in our opposition to WPL since it was first contemplated by government in 1998. In contrast, we are amenable to the introduction of a well thought out road use charging scheme that spreads the cost equitably across all road users, especially if its introduction enables the delivery of a mass transit system and investment in future local transport improvements is ring fenced.
16. Our final main concern is that the transport documents that underpin the JSP have been released in a "back-to-front" order, with the JSP Technical Documents released in November 2018 referencing to DJLTP4, released in February 2019, after the closing date for JSP Technical Document submissions. DJLTP4 then references the Bristol South West Economic Study (BSWEL), which has yet to be released into the public domain. This topsy-turvy process has led to a lack of clarity of what is proposed at the time of each consultation, confusion regarding the way forward and a loss of confidence, particularly in the JSP process. We are of the opinion that the final JLTP4 should be published before the spatial planning aspects of the JSP are scrutinised in a public forum.

Format

17. The remainder of this submission is presented in three sections. First, we highlight the issues that we support in DJLTP4, some of which are subject to comments on scope for improvement. This is followed by a section setting out our main areas of concern, again, some with proposals for

improvement. Finally, we set out some detailed comments on specific aspects of the DJLTP4. To aid understanding, page references within DJLTP4 are provided.

Items We Support

18. In principle, we welcome and support the production of the DJLTP4. We have called for the publication of a replacement for Joint Local Transport Plan 3 (JLTP3) since 2015 by when the five major projects in that document were either delivered, or well on their way to delivery.
19. Section 2 sets out the transport challenges in the West of England and provides useful context. The growth in trips associated with the current JSP proposals is predicted to lead to a 25% increase in trips by 2036 (Figure 2.1). The statistic that two in five car journeys are less than 2km illustrates the scale of car dependence in the West of England. These short car journeys must be prime candidates for transfer to walking, cycling or public transport, particularly in urban areas. The climate change targets (page 14) are also challenging, requiring a combined reduction in absolute CO² in the West of England of 50% from 2014 levels by 2035. Clean Air Plans required to reduce NO² in parts of Bristol and Bath further compound the challenge. Business West acknowledges the considerable challenge that lies ahead for the responsible authorities and their partners in delivering the sustainable growth that is required in the JSP within these parameters. We also encourage the West of England authorities to invest in behaviour change alongside hard infrastructural investment if we are to maximise our chances of meeting these targets (see above).
20. We support the vision and objectives in section 3. We also support the outcomes, with the exception of those that support the JSP SDL locations to which we have objected through the JSP process.
21. We welcome the recognition in section 4 that travel habits and patterns may change as a consequence of technological change. The role of JLTP4 delivery partnerships with, among others, local businesses and business groups is recognised and welcomed by Business West, which remains keen to continue to seek to exert influence through such lines of communication.
22. We support the majority of the major schemes proposed in DJLTP4 because, taken together, they present a reasonable transport strategy that should mitigate both existing transport problems and the impact of future growth.
23. We recognise and applaud the ambition of DJLTP4 in seeking to address the long history of under-investment in transport infrastructure by setting “the most ambitious transport programme ever for the West of England”. Evidence of this continuing problem is presented in the charts on Page 17, where, in spite of the recent increase in investment in the West of England achieved largely through the JLTP3 major schemes, investment in the South West lies bottom and second to bottom of the English regions.
24. We consider that car and goods vehicle use – whether driven or autonomous - will continue to be significant for business movement for the duration of the plan period, so many routes can be expected to remain congested, at least in peak periods. We take a pragmatic approach to this and consider that the key to enabling continued growth in the West of England will be through increases in travel by walking, cycling and public transport. Our position, therefore, supports DJLTP4, as expressed in section 5 on improving connectivity.

25. We note and welcome the considerable increases achieved in the last two decades in the West of England in all three sustainable travel modes. However, while the proportions of trips by walking and cycling are high in comparison with contemporary cities, bus use remains below contemporary conurbations (see Appendix 2 P153). Hence, we consider that the greatest potential to achieve further growth will be through improvements in public transport, achievable through enhancements in bus service route coverage and frequency on new and prioritised routes, coupled with the transformational change that would come through introduction of new rail-based mass transit routes.
26. The target to double bus journeys by 2036 (Appendix 2 P 155) implies a target of approximately 120 passenger journeys per person per year in the West of England (see chart on P153), equivalent to the highest number achieved in any of the other Integrated Transport Authorities in the chart. Clearly, therefore, it represents a challenging target. Nonetheless, we applaud the ambition, note that the target is being exceeded elsewhere (eg. Brighton, which achieved 171 passenger journeys per head¹) and welcome and support the proposed target.
27. Selected new road construction will also be necessary. In particular, we support schemes that: improve access to south Bristol, the port, Avonmouth and Severnside, and Bristol Airport; relieve congestion; improve resilience, especially on the Strategic Road Network; and which open up new development locations that are well located in relation to existing urban areas and employment opportunities.
28. We are aware that the responsible authorities have considered the structure of DJLTP4 carefully and we welcome the chosen structure, which presents the transport issues across all modes for each of four concentric geographic travel zones: Beyond the West of England (WoE); Within WoE; Local; and Neighbourhood. This makes the transport strategy for improving connectivity in each travel zone easy to understand. A relatively minor drawback of this approach is that some modes, for example public transport and managing demand of vehicles, are applicable to more than one zone. This is recognised in Figure 5.2 but tends to be lost in the text for each travel zone category in sections 6 to 9. The significance of each scheme could be made clearer by adding columns to the tables in section 11 to identify the extent of zonal influence for each scheme.
29. In principle, and subject to the recurring caveat about selected JSP SDLs, we support all of the policies in sections 6 to 9 but, in most cases, we find the actual policy text too generic and short. We understand that text highlighted in blue under each policy represents a statement of intent, although this is not made clear in the DJLTP4. In the formal JLTP4 publication, we encourage the responsible authorities to expand on the detail in the individual policies and to make clear the distinctions between policies, aspirations and their justification.
30. We support the policies in section 7, which addresses Connectivity within WoE, and welcome the recognition (in the introduction on page 41) that most business-related travel is by road and that delay adds to cost.

¹ Source: Chartered Institution of Highways and Transportation Journal: Transportation Professional March 2019.

31. The intention to deliver mass transit networks in Bristol and Bath is supported emphatically because, on the basis of visits to numerous contemporary European cities, we agree that it would be transformative. While DJLTP4 acknowledges that most such systems are rail based, there is no statement of intent to deliver a rail-based system. We are firmly of the opinion that the mass transit system should be rail based for reasons of legibility, ease of use, user confidence, speed and comfort, to name just a few.
32. We support the Metrobus proposals on page 45, particularly the Bristol city centre route to Avonmouth/Sevenside route, and the eastern orbital route linking new park and ride sites on that side of the city. We would value clarification that this includes a connection from Avonmouth to Sevenside given the current and projected growth here.
33. We consider Bristol's suburban rail services to be an underused resource and, therefore, support fully the Metrowest proposals (pages 49 and 50). While recognising the difficulties of progressing passenger rail projects, we urge the responsible authorities to ensure delivery of Phases 1 and 2 by 2022 as indicated. In particular, we think that delivery of the service to Portishead will be a significant milestone that should boost government confidence in the WoE for future scheme funding. Looking to the future, we particularly support: the proposed 15 minute turn-up-and-go service between Clifton Down and Bath, and to Henbury, Yate, Portishead and Weston-super-Mare; and the major station masterplan and upgrade for Temple Meads, which we see as being critical to future growth, both of the city centre generally and for Temple Quarter Enterprise Zone.
34. We strongly support the proposals for enhancement of park and ride (P&R) facilities in both Bristol and Bath (page 53). In particular we recognise the priority highlighted for a P&R on the M32 corridor, delivery of which is long overdue. We also support the proposals for new sites: to the east of Bristol, particularly a site at Warmley to serve as a terminus for the eastern mass transit route; near the A38/A4174 junction to the south; and the proposal to the east of Bath.
35. Our members' views on management of demand for use of the road network vary widely (page 57). Many are opposed to any additional constraints upon the movement of vehicles. Others recognise that some form of constraint on road use is necessary. In light of the mix of views, we are not able to offer a member led view on this issue. However, on the strategic matter of raising new funding sources, to help pay for new transport infrastructure, we are able to present a consistent and unified message and this is addressed below in our response to section 10.
36. We welcome policy W5 in its recognition within the transport plan of the importance of the Enterprise Zone and business clustering, which we assume includes the Enterprise Areas.
37. In section 8, which addresses local connectivity, we support all of the policies but consider them to be too generic. Completed schemes are reported at length and we acknowledge that this is required to an extent, to demonstrate a delivery track record and the consequent achievements in modal shift. A Local Cycling and Walking Infrastructure Plan is presented on pages 72 and 73 and list a range of schemes for future delivery. We welcome this statement of intent but suggest its status should be elevated to a policy in the final JLTP4.
38. Evidenced, for example, by our arrangement of a West of England Transport Summit and Debate in January 2019, we support the proposals for business travel planning (page 83). In particular, we welcome the recognition in DJLTP4 of the achievements of North Bristol SusCom and the intention

to encourage others to follow its lead (page 84). This approach should be specifically and heavily promoted to employers in the Enterprise Zone and Areas.

39. We note the evidence presented in section 10 (page 109) on national transport infrastructure spending, programmed to be £18 billion in 2016/17 (1% of UK GDP), and that applied to the South West of England, this would be equivalent to around £1.4 billion per annum. This compares to actual spending in the South West in the range £300 - £390 million in recent years. We consider that these figures present compelling evidence of under-investment in the region and support the case for a step change increase in future investment. This view is underlined by the fact that the South West Region has the longest road network of any English Region.
40. Figure 10.1 illustrates the total estimated cost of the schemes in DJLTP4 and suggests a £6 billion funding gap based upon a range of assumptions. Despite this, subject to our recurring caveat about some of the JSP SDLs, we support fully the ambition encompassed in the DJLTP4 schemes. Further comment on the assumptions is provided in the next section because we consider some to be overly pessimistic.
41. Possible additional sources of local funding are set out at page 111 and include a Workplace Parking Levy (WPL) and Road Use Charge (RUC). Business West formulated its views on these options when the government first consulted upon them in 1998 and has been consistent in its position ever since. Business West would support a RUC applied equitably across all road users. Conversely, Business West is fundamentally opposed to a WPL because it would not apply the charge equitably across all road users.
42. Clearly, further investigation of these options will continue but Business West's position is clear and emphatic. We would favour a RUC scheme that charges all journeys on the road network that contribute to congestion in peak periods, perhaps with an element of the charge being distance, speed and emissions related, subject to the condition that money raised was reinvestment into transport improvements. We note that mobile phone app technology is capable of tracking individual driver distance travelled and speed (and hence contribution to congestion) and suggest that a system based upon these metrics, coupled with vehicle details provided through the DVLA owner registration system, should be able to spread the charge equitably across all who travel on the road network at times when the impact of their journey is greatest.
43. The major DJLTP4 schemes are listed in section 11 and illustrated on Figure 11.1. We support the majority of these schemes, including and especially - despite the cost - the mass transit proposals in Bristol listed as schemes T1 to T4. Of these we see the order of priority as: route T3, to the East Fringe (primarily because the conurbation stretches a long way in that direction but it has not benefitted from any significant upgrades in transport infrastructure such as the new Metrobus routes); T4, to the North Fringe; and T1, to Bristol Airport. We see route T2, to Bath, as the lowest priority as it is already served by a rail connection. The transformational benefits of such schemes in contemporary cities, both across Europe and, for example, in Nottingham, are plain to see. Delivery of a mass transit network in Bristol may require a new local funding stream and this is the main reason for our willingness to accept a RUC in the city. We have not seen sufficient information on the Bath scheme, T5, to express a view but we do not oppose the principle.
44. We support all of package G1 but see the completion of the South Bristol Orbital Link as a particularly high priority because of its potential to improve access to south Bristol, to make it

more attractive to employers. Along with other packages, notably E10, the M4 Junction 18A and Link to the A4174 Ring Road, it would also serve to attract cross city traffic away from the city centre and provide an alternative route to improve resilience when the M5 is congested or blocked.

45. We support package G7 for the Bristol Urban Area, especially the Local Bus Package (GBBN2), and the new P&R on the M32, delivery of which is long overdue.
46. We support all the committed Early Investment schemes (referenced C) and urge the earliest possible conclusion and delivery of the Temple Meads Masterplan (C2) and delivery of Metrowest Phase 1 (C3).
47. We are disappointed and concerned that the report on the Bristol South West Economic Link (BSWEL) study has not been published in time for the recommendations to be considered alongside the DJLTP4 consultation. In the meantime, based upon the limited information provided in item E1 (Appendix 4) somewhat speculatively, we think we may be able to support:
 - Package 2, A38 online improvements from the A368 to and to the north of Bristol Airport;
 - Package 3, the Banwell Bypass, which is another long overdue scheme;
 - Package 4, offline improvement of the A38 north of Bristol Airport, to support future airport growth;
 - Package 6, a rail link from Bristol Temple Meads to Bristol Airport.

There is insufficient information to enable us to comment on Package 7, the second rail package to Bristol Airport, and Package 8, an unspecified link between the A370 and A38. In light of the uncertainty surrounding BSWEL, we reserve the right to make further representations in response to DJLTP4 when the BSWEL report is released.

48. Of the other Early Investment Schemes under development we see the particular merits of:
 - E2, the East of Bath Link;
 - E3, improvement of M5 Junction 19;
 - E4, further passenger rail improvements;
 - E5, extension of the smart motorway network;
 - E10, M4 Junction 18A and the A4174 Ring Road link;
 - E11, Metrobus to Clevedon and Nailsea;
 - E13, the Bath P&R package, within which we see a particular need for a site to the east of the city;
 - E14, the regional electric vehicle charging network;
 - E15, Bristol to Severnside Metrobus, subject to the addition of a route or routes connecting Severnside to the North Fringe; and
 - E18, the Metrobus extension to Cribbs Patchway New Neighbourhood, which will be even more important if an arena is to be opened at Filton.

49. Of the Long Term opportunities, we see particular merit in schemes:

- L2, A46 improvements at Cold Ashton;

- L3, the Greater Bath Bus Network Package;
- L5, reinstatement of passenger rail to Thornbury; and
- L6, the long contemplated link from M5 Junction 20 to Nailsea, although this would need to include a continuous new route to the western end of the A370 Long Ashton Bypass (which is not currently part of package G4).

50. We welcome the proposal in section 12 to identify indicators to enable monitoring of progress for the many schemes proposed in DJLTP4. The proposal to monitor against six year targets (page 125) with interim three year milestone reviews also appears sensible. However, we are not clear how these project monitoring timescales would sit alongside the commitment to produce an annual monitoring report.

51. We support the proposal to set targets but are disappointed that so few targets are actually proposed in DJLTP4. Of the few that are proposed, we welcome the road congestion target, which proposes two targets, green and amber, that both encompass only modest changes in road congestion (page 128). Noting the growth that is planned for the West of England, we consider the small target changes to represent a sensible balance between ambition and pragmatism.

Our Main Concerns

52. We consider that the DJLTP4 presents a strategy rather than a plan because it lacks specific proposals that are ready to take forward in funding bids and on to delivery. A change in government funding of transport schemes is explained in the document (page 8) and is said to mean that LTPs are now more aspirational documents that support bids for individual funding pots that are released from time to time by government. While Business West acknowledges this change, it remains concerned about the shortage of “oven ready” schemes and encourages the responsible authorities to conduct urgently the studies needed to transform the draft JLTP4 into a Plan, which, in particular, includes projects that can be funded and delivered in the next five to ten years, to mitigate existing transport problems and to coincide with the delivery of development already included in adopted Development Plans. Our own initial priorities are set out above at paragraphs 43 to 49.

53. Members with relevant expertise express doubt about the credibility of the SEA on P11 and Appendix 1, in particular, questioning the deliverability of certain rural major transport schemes for reasons of ecological and environmental impact. If these doubts prove to be well-founded, we are concerned that the overall transport strategy may not be sound.

54. The financial information presented on page 17 illustrates the historically low levels of investment achieved in the South West Region. We are pleased to note the significant rise in government funding support achieved by the WoE local authorities to enable delivery of the five major local transport schemes in JLTP3 and through other successful funding bids, which we understand has achieved investment at levels above £100 million over the past five years. We are concerned that those schemes were progressed to a more advanced stage in JLTP3 than most of the aspirational schemes in DJLTP4. Hence, we are concerned that most of the DJLTP4 schemes are not yet developed to the level of detail that will be necessary when appropriate funding streams are released for bidding.

55. As previously noted, the outcomes set out on page 19 are supported in general but subject to the caveat that we do not consider the more remote SDL sites in the JSP to be in sustainable locations. To illustrate this concern, we reference JSP Transport Topic Paper 8 (Update) October 2018 (JSP reference WED007) section 3.3.5. There it is explained that 40% of the new housing in the JSP is in the SDLs, while the remaining 60% is in urban living areas (primarily in Bristol and its north and east fringe) and windfalls/non-strategic growth (for short, the urban sites). Later in the same section it is explained that the SDLs account for 60% of the predicted additional vehicle trips, while the remaining 40% of trips are attributable to the urban sites. From these figures it is clear that the SDLs, including their employment allocations, would generate a ratio of 1.5 vehicle trips per new dwelling (60% of trips/40% of new dwellings), while the urban sites would generate a ratio of just 0.66 trips per new dwelling (40/60). Hence, the SDLs are predicted to generate 2.3 times the number of vehicle trips than the urban sites (1.5/0.66). From this it is clear that urban sites and also, by reference back to an earlier JSP document (see the appendices in JSP document SD16C – the November 2016 Emerging Spatial Strategy: Transport Topic Paper) urban extensions located in the Bristol Green Belt would present a more sustainable transport solution to meet the needs of the West of England in providing the new accommodation required to 2036.
56. With respect to movement in North Somerset, we are extremely concerned that consultees have not been able to view the output report of the BSWEL study (page 30) during the consultation period.
57. We have expressed support for many of the policies in section 7 addressing travel within the West of England but we are concerned by the lack of detailed policies. The numerous paragraphs in turquoise text provide what we understand to be statements of intent and clarification of the status of these paragraphs is required. We also consider that many of these paragraphs need to be incorporated into the actual policies. Examples are provided below.
58. We support the intention to deliver a bus strategy (page 47 and Appendix 2) to include a second Greater Bristol Bus Network (GBBN2) and further Metrobus routes but we are disappointed that this is only a statement of intent rather than an existing specific proposal. This strategy will be pivotal to mitigation of existing transport problems that have been around for many years, and to facilitating future growth. Consequently, we urge the responsible authorities to engage urgently with the bus industry in order to assemble a detailed GBBN2 proposal as a matter of urgency, so it can be included as a definitive policy in the final JLTP4. Business West's particular and often repeated concern in this regard is the absence of proposals to link the North Fringe to the employment sites in the Avonmouth/Sevenside Enterprise Area.
59. As previously stated, we do not support the JSP SDL locations at Churchill/Mendip Spring and at Buckover, on the grounds that they are not sustainable locations for housing and employment when considered from a transport perspective. It follows that we are not able to support the infrastructure that is proposed to enable the delivery of those proposed developments. For this reason, we are not able to support the Sandford and Churchill bypass (page 63 and part of scheme G5 in Table [11.]2 and Appendix 4). We are not opposed to the SDLs at Thornbury and Charfield but this leaves us unclear on the requirements for scheme G6. Hence, greater clarity will be required on the extent to which this package is intended to mitigate the impact of development at Buckover before we can consider supporting it.

60. The Case Study on the Avonmouth/Sevenside Enterprise Area (page 65) identifies the difficulty of reaching the area by modes other than the car. This has been known about and highlighted by Business West for a long time. We are aware from existing employers that recruitment in the area has become increasingly difficult as development has increased in the Sevenside area, accentuated by the lack of public transport provision. While shift working patterns and the relatively low densities of employment are a challenge, it may be that the area is reaching a scale of development where other modes of travel, particularly bus and cycling, may be reaching a turning point of viability, to justify investment in new services and routes. We are concerned that DJLTP4 presents no tangible proposals to address the problems in Sevenside in particular. The statement of intent to develop a strategy for movement in the area is welcomed and we urge the responsible authorities to prioritise this item.
61. In section 8, which addresses local connectivity, we urge the responsible authorities to include more specific proposals for future delivery as policy proposals in the final JLTP4. As noted in the previous paragraph, in particular, we will look for a strategy to improve bus and cycle access to Avonmouth and Sevenside from the North Fringe.
62. One of our main concerns relates to section 10, which addresses Funding and Implementation, where we consider that costs and more detailed funding proposals will need to be presented for the JLTP4 to be regarded as a Plan. Until then, regrettably, at best it can only be regarded as a strategy. That said, we think that the presentation of the funding gap in Figure 10.1 is overly pessimistic.
63. As previously noted, subject to our recurring caveat about some of the JSP SDLs, we support fully the ambition encompassed in the DJLTP4 schemes. Figure 10.1 illustrates the total estimated cost of the schemes in DJLTP4 and suggests a £6 billion funding gap based upon a range of assumptions but we question some of those assumptions (page 110) because we think they will exaggerate the funding gap. In particular, members advise that, at £3,000 per dwelling, the assumed developer contribution towards transport infrastructure is too low, especially for the many strategic sites proposed in the JSP. Indeed, JSP document WED 007, published in November 2018, suggests a figure of £5,000 per dwelling. Applied to all 100,000 new homes in the JSP, a £2,000 increase would close the funding gap by some £200 million.
64. Major scheme funding is said to have been based upon an average over the past 10 years. We recognise - indeed we applaud - the local authorities' successes since JLTP3 was published in 2010/11 in achieving a step-change increase in government funding support for its major projects. While funding mechanisms have changed in the meantime, the responsible authorities have also enjoyed considerable success under the new bidding regime. A platform is presented in DJLTP4 for a further increase in funding of schemes in the South West Region, to address a legacy of pro rata under investment. For all these reasons, we urge the responsible authorities to be more confident in their own abilities to secure government funding and to base the funding in Figure 10.1 on a more optimistic set of bid funding assumptions. As a start, we would reduce the reference period to include only the post JLTP3 era.
65. We have previously noted our fundamental opposition to a WPL (page 111) because it would not apply a charge equitably across all road users. The Nottingham case study (page 112) indicates that that scheme has delivered just £44 million in revenue since 2011, so it is also unlikely to

deliver a new revenue stream sufficient to have a meaningful impact in bridging the funding gap in the DJLTP4.

66. With reference to section 11, the Major Schemes and Summary of Interventions, we recognising that delivery of major transport infrastructure in England is a slow process. Nonetheless, we are concerned about the number of packages for which the timescale is indicated as long term, meaning delivery between 2026 and 2036 (Appendix 3). This reflects the hard reality that JLTP4 is being progressed perhaps three to four years later than was really needed. The responsible authorities are urged to make every effort to progress those schemes that can be delivered within a medium timeframe (5 to 10 years), as many are required to address the West of England's infrastructure deficit and the growth that is already committed in adopted Development Plans.
67. Focussing on the schemes that need to be delivered in this timeframe will also aid understanding of which schemes are needed to mitigate existing problems and which are needed to mitigate future unallocated JSP development. This clarity has been lost since the earlier stages of the JTS study.
68. We are confused by the wording of the targets set for road congestion in Table 12.2, which we read as meaning that a small increase in AM peak journey time would be seen as the green target (implying greater success), while the amber target of a small decrease in journey time would represent a less successful outcome. The inference is that greater congestion is considered to be preferable to less congestion, which, to us, seems perverse. We request clarification on this target in the final JLTP4 document.

Detailed Observations

69. We set out below a few, more detailed comments on the content of the DJLTP4.
70. We note that the proposed "Western Gateway" Sub-National Transport Body (SNTB) (page 8) covers a geographic area stretching roughly north-south and covers the majority of directions of travel to and from the West of England. However, the movement to the south-west, into Somerset and beyond, is not covered by the Western Gateway grouping. We urge WECA to enter into a formal arrangement with the South West Peninsular SNTB to ensure that cross-border movement in this direction is properly and adequately addressed. While SNTBs have not been established in Wales, connectivity across the Bristol Channel also needs to be properly addressed with the interested authorities, especially at present in light of the removal of the Severn Bridge tolls.
71. While it is very difficult to predict the impact of technological changes, we applaud DJLTP4's recognition of the downside risks of autonomous vehicles, including the possibility that people might choose to commute further, if they are able to work on their journey to and from work in a driverless vehicle (Page 21). For some, including those working in manufacturing industry, retail and social services, travel to work is simply not an option, and working hours are fixed, not flexible. While home working has become more widely available, many office workers choose to travel to work because engaging directly with colleagues is the most effective way of delivering tasks. So we consider that peak commuter periods between 7-10.00 and 16-19.00 are likely to remain for the foreseeable future. If an impact of autonomous vehicles on commuting within these periods is to increase travel distances, new mitigation measures may be required. It follows that a

distance-based metric within a road use charging scheme might help to discourage increased commuting distances in a world with CAVs.

72. Policies B1 and B2 in section 6 are too generic. In the final JLTP4 we would like to see all the road and rail schemes proposed in turquoise text in section 6 upgraded from statements of intent to formal policy commitments to support their delivery.
73. The terms Major Route Network (MRN) and Key Route Network (KRN) are identified in the Glossary but the distinction between the MRN and KRN needs to be clarified in the final JLTP4.
74. The information on freight movement on page 66 lacks detail and needs to be bolstered in the final JLTP4.
75. We note and welcome the proposal to address Clean Air Zones separately to the JLTP4 due to the timescale and complexity of the associated issues (page 93). While supportive of measures to encourage take up of cleaner vehicles, we are advised of concern within the housebuilding industry about the implications for electricity demand in new residential developments of a wholesale requirement for home electric charging. Industry collaboration is recommended to properly understand the wider implications for sustainable development when reviewing and setting new parking standards (page 96).
76. Turquoise highlighted text on page 101 states an intent to require developers to make developments bus friendly by reference to “.....guidance published in 2017”. More than one document providing guidance on designing for buses was published in 2017. It would be useful to have clarification on which guidance is being referenced.

Appendix A - Extract from Business West's January 2019 Response to the JSP Technical Reports Consultation

Transport and the JSP

66. The West of England has set out to plan its future housing and employment land growth alongside its transport needs, through the parallel publication of the Joint Spatial Plan and Joint Transport Study (JTS). This is an entirely sensible approach – given how interlinked the two elements are.

67. The current framework for spatial planning set out by the JSP for growth in housing, employment and urban living remain at risk of being unsustainable and creating serious problems of future congestion, accessibility and undermining the region's economic vitality.

68. The latest 2018 version of the NPPF sets out some clear guidelines on the need to consider sustainable transport impacts during plan making. This includes:

- Paragraph 102: *“Transport issues should be considered from the earliest stages of plan-making and development proposals, so that:*
 - a) the potential impacts of development on transport networks can be addressed;*
 - b) opportunities from existing or proposed transport infrastructure, and changing transport technology and usage, are realised – for example in relation to the scale, location or density of development that can be accommodated;*
 - c) opportunities to promote walking, cycling and public transport use are identified and pursued;*
 - d) the environmental impacts of traffic and transport infrastructure can be identified, assessed and taken into account – including appropriate opportunities for avoiding and mitigating any adverse effects, and for net environmental gains”*
- Paragraph 103: *“The planning system should actively manage patterns of growth in support of these objectives. Significant development should be focused on locations which are or can be made sustainable, through limiting the need to travel and offering a genuine choice of transport modes.”*
- Paragraph 108: *“In assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that:*
 - a) appropriate opportunities to promote sustainable transport modes can be – or have been – taken up, given the type of development and its location;*

69. We do not believe that the JSP and the latest evidence assessments have followed these guidelines when making their spatial choices for development.

Transport Sustainability of Strategic Development Locations

70. Whilst Business West accepts that it is for the West of England authorities to decide on Strategic Development Locations based on a range of sub regional and local considerations, we believe that many of the current proposed Strategic Development Locations set out in the JSP cannot be made sufficiently sustainable from a transport perspective when compared to others which could have been reasonably included. This view is supported by the West of England's own transport assessments and by its most recent Consolidated Sustainability Appraisal.^{234 5}

71. We believe the current JSP and the concentration of Strategic Development Locations 'beyond the green belt' will lead to a significant diversion of financial resources, which the West of England estimates at £2 billion, including £1.8 billion of public subsidy⁶, towards transport investment that would be better spent elsewhere and which would be better able to support economic growth in the region.

72. The transport testing of strategic options set out in the appendices to the JSP Transport Topic Paper (November 2016) concluded with two key principles (p40), namely that:

- "Firstly, sites closer to the urban area are, in general, easier to serve with good quality transport options"
- "Secondly, many of the sites located beyond Green Belt have relatively poor travel choices and therefore pose challenges in improving travel choices and mitigation of their impacts".⁶²

73. These findings by the West of England's transport consultants, and contained in the West of England's own transport topic paper, are highly critical of the 'beyond the green belt option'. The WoE JSP Transport Topic paper concludes that:

"Test 1 [building beyond the green belt] has fundamental challenges. Locating development beyond the Green Belt results in large volumes of travel on sub-regional corridors, with poor travel choices in many cases. The road network has a number of capacity constraints, causing serious congestion problems at a number of locations. Particular problems are forecast at Yatton, Nailsea, Bristol Airport and routes from the Somer Valley to Bristol. In particular, the testing has forecast high volumes of traffic using M5, which will be difficult to mitigate. It is possible to implement measures to promote good travel choices and mitigate impacts, but the fundamental challenges of longer-distance travel remain. The mitigation package for Test 1 is estimated to cost ~£2.0 billion: this is the most expensive of the three tests, and even then the mitigation package cannot fully address the journey time impact of the developments in this test." (Page 40)^{63 7}

² West of England Joint Spatial Plan, Emerging Spatial Strategy: Transport Topic Paper, November 2016

³ West of England Joint Spatial Plan: Transport Topic Paper 8 (update), November 2018

⁴ West of England Joint Spatial Plan: Emerging Findings Transport Report, November 2018

⁵ West of England Joint Spatial Plan: Consolidated Sustainability Appraisal November 2018

⁶ West of England Joint Spatial Plan, Emerging Spatial Strategy: Transport Topic Paper, November 2016

⁷ Additional findings in the West of England's JSP transport topic paper⁶⁴ found that:

74. At this point the West of England authorities should have made adjustments to their spatial strategy, but they did not.
75. These transport studies were followed by a Transport Topic Paper in April 2018, a Transport Topic Paper 8 (Update) in November 2018 and alongside it, an Emerging Findings Transport Report, also November 2018.
76. The new WED007 Transport Topic Paper 8 Update continues to highlight the serious negative transport impacts of the proposed SDLs. This includes the observations that:
- a. “Many people living in rural areas, villages, small towns and suburban areas are heavily dependent on cars in meeting their movement needs” (page 23 WED007)
 - b. “The residential allocations ([from the SDLs] result in significant outbound traffic during the AM peak and inbound traffic during the PM peak” (page 22 WED007)
 - c. “This poses a challenge of managing and accommodating heavy travel demands”. (page 22)
 - d. “Forecast car trips to and from the urban living areas ... are substantially lower than those for the SDLs reflecting greater potential for trips by sustainable transport modes.” (page 22)
 - e. “In the case of the SDLs, there is currently a relatively high level of dependence on travel by car in many cases. Large numbers of people commute from these communities... in many cases significant investment will be required to improve public transport choices. In many cases this will be challenges, due to relatively low levels of service provision and long journey times to key destinations.” (page 25)
 - f. The SDLs “will generate large volumes of travel demand, which will be concentrated in key transport corridors” (page 26)
77. WED007 finds that the SDLs, “account for around 60% of additional vehicle trips” despite making up 40% of the housing allocated within the JSP. It also found “that the implied trip rate for additional dwellings not located in SDLs is around half that of those located in the SDLs”. (both quotes page 23 WED007).

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- “The costs [for building beyond the green belt] ... are higher because significant infrastructure is needed to improve travel choices and mitigate the impacts of longer distance traffic”. (Page 38)
 - “This ... generates significant long distance travel, including traffic on the M5, which will be difficult to mitigate.” (Page 30)
 - “There are significant numbers of trips on key routes, for example A370, A371, A38, A37, A39, A362, A367, B3116, A4 (East), A432 and B4058. The M5 is used by traffic from Yatton/Congresbury and Clevedon via Junctions 20 and 21. ... These routes would experience increased traffic delays, particularly at junctions.” (Page 30)
 - “Overall, the traffic impacts of this [for building beyond the green belt] ... will be difficult to fully mitigate due to the long travel distances to key destinations.” (Page 31)
 - “The proposed mitigation packages are substantial ... This is particularly the case for Test 1”. (Page 39)
 - “Test 1 showed the largest increase in journey times across the network before mitigation is applied. This is due to the relatively long distances between new housing and key destinations, together with significant congestion impacts on the network. Tests 2 and 3 showed much lower increases in journey times before mitigation is applied. This is due to shorter distances between new housing and key destinations and more concentrated congestion impacts.” (Page 39)
 - “However, in the case of Test 1, it was not possible to fully mitigate the impacts and overall journey times would be slightly higher” (Page 40)

78. Additional traffic generated will lead to “significant impacts of the SDLs in the south east, south west and northern parts of the sub-region”. (page 26). Whilst “the concentration of new housing and employment at the SDLs is forecast to result in significant delays on certain parts of the highway network” with “increases in traffic delays” on 18 highlighted roads, motorways and motorway junctions across the region. (page 29)
79. WED007 also finds that the JSP will lead to increases in congestion that will mean “the average delay experienced by users of the network would increase by 20%, which would contribute to an overall 4.4% increase in average journey times and a 4.5% reduction in traffic speeds across the West of England”. (page 26)
80. Despite these recent additional findings, the West of England authorities have made no adjustments to the spatial strategy within the JSP.
81. The publication of these later documents therefore do not change our concern about the sustainability of some SDLs or the need for a thorough Green Belt review to assess more sustainable development through either Scenario 2: ‘Concentration at Bristol urban area’ and also Scenario 3: ‘Transport focussed’ as set out in the Consolidated Sustainability Assessment.^{8910 11}
82. The Emerging Findings Transport Report include summary findings on study reports which have not been published and which ought to be available as JSP documents.
83. We also believe the current JSP will lead to higher infrastructure costs and fewer resources being available from land value capture, thus making it harder to pay for infrastructure requirements or support the West of England’s ability to deliver the affordable housing it needs. This is backed up by our concerns over the recently published West of England Updated Viability Assessment.¹²
84. In addition, many of the sites identified within the JSP process, notably some of the Strategic Development Locations, have very large gaps identified between the likely infrastructure funding raised locally and the cost of infrastructure mitigation measures identified in the JSP evidence papers.
85. The costs of mitigating a strategy based largely on sites beyond the Green Belt are the highest of the strategic options. While transport impacts might be mitigated to varying degrees, the funding required to achieve this is greater and substantial. There is no indication of an analysis which shows that the additional costs justify a lack of a meaningful consideration of alternative spatial options.

⁸ West of England Joint Spatial Plan: Transport Topic Paper, April 2018

⁹ West of England Joint Spatial Plan: Transport Topic Paper 8 (update), November 2018

¹⁰ West of England Joint Spatial Plan: Emerging Findings Transport Report, November 2018

¹¹ West of England Joint Spatial Plan: Consolidated Sustainability Appraisal November 2018

¹² West of England Joint Spatial Plan: Updated Viability Assessment November 2018. Business West are making more detailed comments about the Viability Assessment and our concerns to the upcoming Joint Spatial Plan consultation closing 7th January 2019.

86. In the West of England's WED005, Updated Viability Assessment, SDL total infrastructure requirements are based on a headline transport infrastructure contribution per dwelling of £5,000 (based on a well connected and high value site at Filton, north Bristol).
87. The total contribution of SDL's to transport infrastructure funding is seen as remaining at a simple multiple of this (para 3.4.15).
88. There therefore remains a significant funding gap between the transport mitigation costs required in the current JSP scenario and this contribution, noting "there will be a requirement for substantial investment from central government in new infrastructure" (para 3.4.16) or "funding from the West of England Investment Fund" which was created "with a strong focus on supporting economic growth".
89. These funding gaps are particularly pronounced for some of the SDL sites within the current JSP. For example:
- CHURCHILL – $2675 \times £5000 = £13.4\text{m}$ contribution. Bypass cost (WED008 Table 6.3): £120m. Shortfall £106.6m
 - THORNBURY, BUCKOVER, CHARFIELD (Taken together as costs combined in WED008) – $(500+1500+1200) \times £5000 = £16\text{m}$. Package cost (Table 7.3) £79m. Shortfall £63m.
 - BANWELL – $1900 \times £5,000 = £9.5\text{m}$. Bypass cost (Table 6.3) £55m. Shortfall = £45.5m.
90. Business West recognises that there are other local factors that influence the decision for some of the proposed SDLs. For instance, requirements for village by passes (Banwell and Churchill), improved access to the airport from the M5 and central Bristol (currently part of a strategic transport review of the A38, M5, and rail and bus options across the area), potential rail link (Charfield), linkages to Weston Super Mare and a possible M5 growth corridor linked to the new nuclear power station at Hinkley, the incorporation of garden village principles to enable communities to function self-sufficiently and local land value capture prospects. However, it remains unconvinced that the sub regional evidence which has been presented that makes the case that the JSP's spatial choices, particularly around the SDLs, justify the additional infrastructure costs they will create versus other plausible alternative choices open to the West of England authorities.