

West of England Joint Spatial Plan
c/o South Gloucestershire Council
Planning
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LETTER BY EMAIL

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West of England Joint Spatial Plan – Publication Document Consultation

North Bristol SusCom Ltd. is a group of leading employers, located in North Bristol, promoting **sustainable commuting** to our 40,000 employees, 30,000 students and many visitors. We have been working together to influence and improve local sustainable transport provision to **combat traffic congestion** and reduce the impact upon our environment.

Congestion in the West of England currently costs the local economy around £300 million per annum. If we do nothing to address our current transport deficits and predicted growth, that figure is expected to rise to £800 million per annum by 2036. In planning for future growth in the West of England, we need to ensure we do not repeat past mistakes and that we build new homes and jobs in the right places, with the necessary transport infrastructure that promotes and encourages people to move in, around and through our area by the most sustainable means possible.

North Bristol SusCom has been involved in the previous two JSP public consultations and in the development of and consultations on the Joint Transport Study (JTS). The JTS has identified over £8.5 billion of investment needed over the next 30 years to address current infrastructure deficits and to support future growth.

We have worked closely with our North Bristol SusCom members and other organisations like Business West and Bristol Green Capital's Sustainable Transport Network to engage with and input into the Joint Spatial Strategy and Joint Transport Studies. We have read and support the submissions



being made as part of this consultation by both those organisations.

As businesses, it is vital that we are able to attract and retain the workforce we need for our businesses to thrive. There are two major issues that impact on our ability to contribute fully to the economic prosperity in the region and relate to this current JSP consultation:

1. Housing affordability
2. Congestion and limited sustainable travel choices

Our colleagues in Business West will be providing a much more detailed response with accompanying evidence in relation to housing numbers and housing locations and employment land allocation in the JSP – which we support - but there are two key points we wanted to highlight directly ourselves.

These two points we raise here relate to the unsoundness of the JSP.

1. Severn Crossing Toll removal

The JSP needs to take account of any assessment of the impact the removal of Severn Crossing Tolls will have on the West of England Housing and Employment markets and the JTS needs to better address the impact this will have on congestion and need for improved sustainable transport links between South Wales and North Bristol.

The Functional Housing Market Areas identified by the West of England Authorities in the JSP do not include South Wales (particularly Newport, Chepstow and potentially Cardiff). Through annual travel to work surveys we have undertaken with our employees and through employee postcode mapping, we know that a growing proportion of our employees live in South Wales and commute regularly to North Bristol for work.

Employees have been attracted to live in South Wales due to lower house prices but have regularly complained about the costs of the Severn Bridge Tolls and the lack of sustainable transport options (or the high cost, lack of capacity, poor frequency in existing sustainable transport options) for their commute to North Bristol.

Since the bulk of the JSP evidence was compiled, the Government has made a significant announcement to reduce the cost of the Severn Crossing Tolls on Monday the 8th January 2018 and to completely remove the Tolls by end of December 2018.

In January 2017, “**The Severn Crossings: Reducing toll prices and other issues**” consultation document was issued by the Department for Transport and the Welsh Office: The document makes the following points:

“Research indicates that the reduced toll charges will result in some increased traffic – of around 17% by 2028.” (page 5)

It is fair to assume that complete removal of the tolls will result in higher levels of increased traffic.

“Options the Government is not considering. Abolishing the tolls. The Government is aware of the views expressed by some stakeholders that the tolls should be abolished altogether. But this would put at risk the future of the Crossings. The Crossings cost approximately £15 million each year to operate and maintain. During the course of the concession the Government incurred approximately £63 million to cover the costs of fixing latent defects on the Severn Bridge and this money still needs to be recovered.

Furthermore, Highways England estimate that likely resurfacing of the Severn Bridge after the end of the concession period will cost in the region of £12 million. The reality is that given the size and complexity of these structures there will always be a cost to ensuring their safe operation; and it has long been Government policy that the costs associated with keeping the Crossings functioning should be paid for by the users that benefit, rather than the taxpayer.

The Government is also concerned that reduced tolls could result in increased traffic and congestion in areas surrounding the Crossings, both in Bristol and along the M4 in Wales, where there are already concerns about congestion levels. Reducing the tolls by 50% would allow us to assess the

impact, on the Crossing and more generally, of increased traffic flows.” (Page 12)

and finally

“Impacts of the Government’s proposals - Forecasts indicate that traffic across the Severn Crossings will increase by 28% between 2018 and 2027. But as a result of our proposed toll levels, based on the results of independent modelling commission by the Department, traffic growth will increase by 45%. Consequently because of reduction in tolls traffic volumes are forecast to increase by 17% over and above what they would have done. The Government is considering ways to manage this effect, including considering the options for free-flow tolling and day-time only tolling. (Page 14)

The impact of no tolls, we believe, is now being assessed but has not fed into either the JSP and JTS.

With large numbers of jobs being created in Avonmouth/Sevenside and Filton Enterprise areas, in particular, many people in South Wales will be attracted to work in these areas in the West of England and many people living in or relocating to the West of England will be looking at the housing option in South Wales.

This will lower the 90% figure quoted in the JSP of people who live and work in the West of England and impact on the EDNA as the FEMA should be expanded to include South Wales. The functional containment outlined in the JSP will be disrupted by the removal of tolls and is not sufficiently acknowledged or considered in the JSP and some additional work needs to be undertaken to ensure this is reflected in the JSP. This will also have a knock-on impact on the JTS which currently looks at connectivity within the West of England. It too will need to be expanded to look at connectivity to key housing areas outside the West of England like South Wales.

Without taking into account the impact of the Toll removals on the housing market, the economy and transport the JSP is not sound and should be amended to take this issue into account.

2. Strategic Development Locations – Green Belt vs. Transport Focused Development

We know from our engagement with businesses and from the annual travel to work surveys, that those employees that have sustainable transport options connecting where they live to where they work are more likely to travel more sustainably, more often. A huge amount of the congestion we currently suffer in the West of England is from a lack of investment in transport infrastructure over a long period of time. This is now starting to change but a significant proportion of measures identified in the £8.5 billion Joint Transport Study are to deal with current infrastructure deficits. Therefore, we need to ensure that we do not make the same development mistakes we have in the past.

In the earlier public consultations on the JSP, Issues and Options 2015, the Councils concluded that *“most respondents considered the best spatial scenario for the West of England area to encompass Transport focused development and protection of the Green Belt.”*

It is worth highlighting that “transport focused development” is defined in the consultation as follows: *“This scenario is focused on locations judged to work due to their access to sustainable transport choices – urban areas that already have good travel choices are the priority for development. There could be a combination of urban intensification, South Bristol urban extensions and public transport focused development.”*

We and others argued, in earlier consultations, that transport focused development and protection of the Green Belt were often incompatible and conflicting priorities. Yet it appears that the Assessment of Strategic Development Locations (SDLs) has given much greater weight to the protection of the Green Belt at the expense of transport focused development.

The Joint Transport Study is aimed at increasing the use of sustainable transport – the transport proposals for many of the SDLs that jump the green belt **are not** sustainable in transport terms. The mitigations, improvements proposed for those outer SDLs are very road reliant (new roads, drive to a Park & Ride) and will lead to increases in car based

journeys which is not sustainable and very much repeats the mistakes of the past.

Having only one real alternative transport option to the private car in an SDL location is not sustainable in the short, medium or longer term. The SDLs that jump the Green Belt will require investment above and beyond those proposed in the JTS to become more sustainable. Their poor proximity to major employment locations means that they are unlikely to achieve the level of sustainability required to meet the targets identified in the JTS to limit the growth in car journeys.

We think the criteria used to select and discarded the SDLs considered through the JSP process should be reviewed and that a thorough Green Belt review should be undertaken. The plan's choice of SDLs currently strikes an imbalance between the aims of protecting the Green Belt and choosing sustainable transport focused option locations - proper weighting needs to be given to sustainability and transport accessibility issues.

We hope these points will be taken into account when addressing the soundness of the JSP. We do not consider it necessary for us to take part at the oral part of the examination.

Yours Sincerely



Ann O'Driscoll
Director