

TravelWest: Joint Local Transport Plan 4 (2019-2036)

Response to the Consultation by Burrington Parish Council

The four West of England authorities (WECA and North Somerset) have created considerable confusion by their consultations on the Joint Spatial Plan, Local Plan Reviews and the Joint Local Transport Plan (JLTP4), because of apparent inconsistencies in the content of the various consultation reports; inadequate information, especially in relation to transport proposals and their impacts on the existing highway network; and the absence of a co-ordinated programme for consultations with proper advance notice of the consultations to parish councils and other interested parties.

The main concerns of Burrington Parish Council about the Joint Local Transport Plan are its approaches to:

- existing problems on local roads;
- impacts of airport expansion on local roads;
- impacts of traffic generated by the proposed Strategic Development Locations ('*New Garden Villages*') at Banwell and Churchill; and
- impacts of proposed major road schemes, including the proposed M5 Junction 21A, the M5-A38 corridor (A371/A368) and the A38, on local roads.

Our concerns also include the impacts of additional traffic generated by these road schemes and related developments on the A368 east of the A38 towards Bath, which passes through a number of villages. In the documents published so far, we have been unable to find details about forecasts of traffic generated by the proposals and their impacts on local roads and villages.

We have already commented on the Joint Spatial Plan (including the additional consultation on Technical Evidence in November 2018) and the North Somerset Local Plan, Issues and Options report.

In our responses to the JSP additional consultation on technical evidence, we drew attention to a lack of clarity about transport proposals especially those for a new M5 Junction 21A, a new road to connect Junction 21A with the A38 and

proposed changes to the A38/A368 junction at Churchill Gate. (A copy of those comments on the JSP is appended.)

Consultations on the JSP and North Somerset Local Plan failed to address the details and implications of these road proposals, ostensibly (according to officials) because the road proposals were not required to accommodate the development proposed in these plans.

The NPPF (paragraph 104) requires local plans to take an integrated approach to the planning of land-use and transportation, reflecting established practice over many decades. It is surprising, therefore, that the councils have sought to separate development proposals in the JSP and Local Plan Reviews from transport proposals in the draft JLTP4.

Our comments on the additional JSP Consultation on Technical Evidence (copy attached) point out a number of confusions about the relationship between land-use proposals (particularly the SDLs/*New Garden Villages*) and transport proposals related to the A371/A368 corridor.

In the Emerging Findings Transport Report (WED008) for the JSP, Table 6.2 identifies M5 Junction 21A as an option that is **not** being taken forward. It states:

*'A new motorway junction on the M5 between J21 and J22 and located close to the A371 motorway overbridge is included in a separate study looking to improve access in the Bristol to Weston-super-Mare corridor. **This option does not form part of the proposed JSP transport programme, and consequently is not considered further here.**'*

However, page 63 of the draft JLTP4 states:

'We will work with Highways England to provide a new Junction 21A on the M5 motorway south of the existing J21. This will be supported by a new multi-modal corridor connecting the new junction with the A38, bypasses for the villages of Banwell, Sandford and Churchill and major improvements to the A38 between Langford and South Bristol. The scheme will improve links to the airport and improve resilience of the Strategic Road Network. It will facilitate SDLs at Banwell and Mendip

Spring Garden Village and Urban Living in Weston-super-Mare. It will also support growth at Bristol Airport.'

Section 11 of the draft JLTP4 shows the A371/A368 Banwell Bypass and A368 Churchill and Sandford Bypass in Table 2 as '*shortlisted major scheme options designed to mitigate JSP growth*'.

These schemes also appear in Appendix 4 of the Draft JLTP4, *Major Scheme Details*, in relation to Major Scheme Ref. G5 (*Corridor Scheme Packages to mitigate JSP Growth*) and Major Scheme Ref E6 (*Early Investment Schemes Under Development*).

A number of questions are therefore raised by the JSP documentation and the Draft JLTP4:

- Has the '*separate study looking to improve access in the Bristol to Weston-super-Mare corridor*' been completed? Does it form part of the evidence base of the draft LTP4? Is it published and, if not, when will it be published?
- Are the road and junction proposals on the A371/A368 corridor needed only to mitigate the highway impacts of the proposed SDLs?
- Are the proposals for the SDLs deliverable without the road proposals for the A371/A368 corridor?
- Are the road proposals for the A371/A368 corridor justified without the SDLs in order to '*support*' a new Junction 21A and to '*improve links to the airport and improve resilience of the Strategic Road Network*' through road and junction changes on the A371/A368 and A38?
- Is a new Junction 21A justified and feasible without the road proposals for the A371/A368 corridor?
- Are the SDLs being proposed (partly or mainly) because they are expected to help deliver the road proposals in the A371/A368 corridor in support of a new Junction 21A to serve airport expansion and other transport objectives?

The SDLs are only draft proposals in the JSP and Local Plan Issues and Options. They are subject to public examination of the JSP. Even if they were included in

the adopted JSP as strategic proposals, they would still be subject to further, more detailed examination as Local Plan proposals.

A number of representations on the JSP have raised serious doubts about the desirability and deliverability of the proposed Strategic Development Locations, including concerns about inadequate information and analysis of transport impacts.

Highways England has raised serious questions about the impacts of airport expansion on the local highway network, which are not adequately addressed by the information submitted in support of the current planning application to expand the airport. Are their concerns addressed in the draft LTP4?

JLTP4 is not subject to public examination. How will it respond to issues raised in the examination of the JSP? How will the JSP examination respond to information from the JLTP4 consultation?

APPENDIX

**THE RESPONSE OF BURRINGTON PARISH COUNCIL TO THE JOINT
SPATIAL PLAN CONSULTATION ON ADDITIONAL TECHNICAL EVIDENCE
(12 NOVEMBER 2018 TO 7 JANUARY 2019)**

JOINT SPATIAL PLAN: RESPONSES TO THE CONSULTATION ON TECHNICAL EVIDENCE (12 NOVEMBER 2018 TO 7 JANUARY 2019)

A. SUSTAINABILITY APPRAISAL (WED009 and WED009/A/B/C)

The Sustainability Appraisal (SA) does not meet the requirements of the Inspectors who are examining the JSP, as set out in their letters dated 28 June (ED02) and 1 August 2018 (ED03), for the following reasons:

- It provides **no** additional information about the selection of Strategic Development Locations and provides **no** justification for the rejection of other reasonable alternatives, including land in the Green Belt, south west of Bristol. The SA simply refers to other reports produced earlier.
- There is **no** additional information on the justification for the SDL policy criteria in Policies 7.1 to 7.12, as requested by the Inspectors.
- There is **no** sustainability appraisal of maintaining the existing Green Belt policy at Ashton Vale. In the Non-Technical Summary (WED009A), paragraph 5.68 indicates positive impacts for this location in relation to accessibility to major employment areas (Objective 3b) and access to town centres (Objective 2e). These and other advantages for sustainable development, including the availability of primary infrastructure, should be weighed against the aims of Green Belt policy, as required by paragraphs 138 and 139 of the National Planning Policy Framework (July 2018).

The SA is, in effect, offering '*post hoc*' justifications for earlier decisions – contrary to the requirement of the Inspectors for it to be carried out '*with an open mind*'.

It is essentially a compendium of subjective judgements, structured largely in matrices of objectives and policies, and summarised by a simple scoring system, with no weighting of objectives or scores, and without much in the way of empirical evidence.

We cannot provide an exhaustive critique of the Sustainability Appraisal (SA) as the various volumes of text and tables are extremely repetitious and difficult to follow, especially as they move between different stages of the JSP process and rely heavily on abbreviations that need to be referenced for each page of the many tables.

We therefore focus on the proposed **Churchill SDL**: to provide some examples of the unreliability of the subjective judgements, unsupported assertions, contradictions with other judgements and conflicts with other JSP evidence (particularly the transport reports) that are found in the SA.

The only positive SA impact identified for Churchill SDL in the Non-Technical Summary (WED009A) is access to educational facilities, although the existing schools would not be adequate to accommodate the demands of the SDL, so that judgment is of doubtful relevance. Negative impacts of the Churchill SDL are identified (in Section 5 of WED009), in relation to access to town centre services and facilities, access to employment areas and loss of agricultural land.

Some of the judgements in the SA are simply irrational, e.g. paragraph 5.22 of the Consolidated SA Report:

'Many of the SDLs set out in the policy (Policy 2 - The Spatial Strategy) are also well related to the existing town centre areas which provide access to services and facilities. However, it is noted that the more rural locations (including Buckover, Banwell and Churchill) where new garden village style settlements are to be delivered will have limited access to existing services and facilities, particularly of a more substantial nature, dependent on the specific design and pattern of development to be delivered. As such a mixed effect (minor positive/uncertain minor negative) is expected in relation to SA objective 2e: access to town centre services and facilities in the medium and long term.'

Negative effects on lifestyle in some SDLs cannot be offset by more positive effects in other SDLs. Sustainability appraisal is supposed to address significant negative effects. In this case, the poor accessibility to town centre facilities of the proposed Churchill SDL cannot be mitigated.

In other cases, negative effects are identified but downplayed without adequate justification, e.g., in paragraph 5.52 of WED009A:

'Development in Nailsea and Backwell, Banwell and Churchill, Coalpit Heath, Buckover, Charfield, Yate and Thornbury will increase travel distances and improvements will be required to travel choices from these locations. Banwell and Churchill are particularly problematic in transport terms, but the proposed infrastructure will enable improvements to conventional bus and MetroBus feeder services to be considered.'

To say that public transport service improvements can 'be considered', without identifying solutions, does not offset the disadvantages of the identified locations in terms of travel distances or transport choices. There is no evidence that the significant negative effects of distances from town centre facilities and employment, and the very limited available public transport services, could be mitigated by the JSP.

Some judgments are simply nonsensical, for example in paragraph 5.59 of WED009:

'A significant positive effect has been recorded in relation to this SA objective (4a historic environment) for Churchill Garden Village SDL given that policy requirements would protect and retain identified nearby heritage assets with particular attention to be given to Windmill Hill.'

If there were no proposed SDL, there would be no risk of adverse impacts on heritage assets like Windmill Hill and no need for 'policy requirements'.

Perhaps most serious of all are the major inconsistencies between Chapter 5 of the SA (WED009) relating to the submitted JSP on the one hand and the Transport Reports (WED007 and WED008) and Proposed Changes (WED002) on the other.

The SA (WED009) refers repeatedly to a new M5 Junction on the A368 corridor, e.g. in paragraphs 5.39, 5.41, 5.101 and 5.109 and 5.116, (three of which also refer to capacity improvements to the A38/A368 junction at Churchill), but the Schedule of Proposed Changes (WED002) and the Transport Reports (WED007 and WED008) state that the new M5 junction is not part of the JSP proposals. The A38/A368 junction is also omitted from the shortlisted options in Table 4-1, the Transport Programme, in WED007.

B. TRANSPORT REPORTS (WED002, WED007 and WED008)**1. M5 Junction 21A:**

In the **Schedule of Proposed Changes (WED002)**, it is proposed (**PC12**) to delete reference to 'a new M5 junction' from the package of highway schemes referred to in Policy 7.6 of the JSP (Churchill SDL).

However, PC08 proposes to retain two references to a new M5 junction in Policy 7.5 of the JSP (Banwell SDL):

'Development requires the construction of the Banwell Bypass in conjunction with residential development as part of the M5 to A38 highway improvements with a future connection to a new M5 Junction 21a at a location to be confirmed, and onward connection to the Sandford/Churchill Bypass ... Development must not prejudice the delivery of future improvements to M5, including the construction of the new M5 junction.'

In the **Emerging Findings Transport Report (WED008)** Table 6.2 identifies M5 Junction 21A as an option that is not being taken forward. It states:

'A new motorway junction on the M5 between J21 and J22 and located close to the A371 motorway overbridge is included in a separate study looking to improve access in the Bristol to Weston-super-Mare corridor. This option does not form part of the proposed JSP transport programme, and consequently is not considered further here.'

Section 6.3, Programme, reiterates that the option for a new M5 motorway junction does not form part of the proposed JSP transport programme), but it refers to new bus services to serve 'new developments and Park & Ride **at a new M5 J21A**'.

A new M5 junction is also included in Section 6.4 of that report, (Impacts of Programme)

'to show its contribution to and the complementary need for the JSP bypass schemes.'

The footnote to Table 6.6 says the new junction 'will be delivered separately' and the last paragraph at the bottom of page 28 adds the following statement:

*'The Sandford & Churchill Bypass would have poor value for money if provided in isolation, without any other scheme or JSP development. But with the Banwell Bypass it provides additional benefit to the local highway network and to the bypassed villages, **which is improved further when the additional traffic volumes arising from an M5 J21A are included** (showing a Very High economic impact or benefit).'*

What is the separate study that is considering Junction 21A? A new M5 junction is bound to be related to the A371/A368 corridor (even if its location is 'to be confirmed'), so why is it not being considered in conjunction with the SDLs and other issues relating to the A371/A368 corridor?

2. A368/A38 Junction at Churchill Gate:

In the **Transport Topic Paper 8 Update (WED007)**, Figure 2.1 (*Transport Mitigation Package*) shows a new/improved junction between the A368 and A38 at Churchill Gate. The junction is also identified as a '*congestion hotspot*' in Figure 3-1 (*Traffic Congestion*). The A368/A38 junction at Churchill Gate is also identified in Figure 4-2 (*Transport Programme*) for a road junction upgrade (Scheme 5e).

However, this junction does not appear in the lists of impacts to be mitigated in 3.4.4., following increases in traffic resulting from the JSP proposals including the proposed Churchill SDL (unless the A368 is considered to be a side road adjoining the A38 near Bristol Airport); and it does not appear in Table 4-1 (*Transport Programme short-listed options*) where there are only 4 listed schemes (5a to 5d). What is the status of the proposed upgrade of the A368/A38 Junction (Scheme 5e)?

The following statement on page 28 of the Transport Topic Paper 8 Update (WED007) about the traffic impacts of the Churchill Garden Village is particularly alarming to people who know and use Stock Lane:

*'Traffic to/from Churchill would route via the A38 to the east **and would also head north via Stock Lane** towards Congresbury, with traffic then continuing on the A370 eastbound towards Bristol and westbound towards Weston-super-Mare and subsequently northbound on the M5 from Junction 21. Some traffic would also continue north through Yatton towards Clevedon.'*

It is not yet known how the proposed Churchill Garden Village would connect with Stock Lane, but there would inevitably be substantial increases in traffic flows south via Stock Lane to Langford, the A38 and eastwards via the A368. The section of Stock Lane between Duck Lane and Jubilee Lane is narrow and in places there is insufficient road width for two lorries to pass which frequently causes delays.

3. Evaluation of Schemes:

On page 6 of the Emerging Findings Transport Report (WED008), the 3rd paragraph states:

'Economic impacts were assessed using a transport model to forecast benefits, which were then compared against costs to estimate the potential value for money (VfM) of each scheme.'

Section 4.6 of the Transport Topic Paper 8 Update (WED007) says:

'Transport modelling is being used to inform the analysis of the potential economic impacts of the programme.'

Where are the results?

Summaries of economic impacts are presented in paragraph 6.6 of the Emerging Findings Transport Report (WED008), but they are not consistent with judgements in the previous tables which do not indicate a '*strong business case*' or '*medium to high delivery case*'. The data on which these judgements are based must be published.

We are also concerned about inconsistent statements relating to the A368 east of the A38 (towards the A37 and Bath).

Page 42 of the Transport Topic Paper concedes:

*'there will be a significant increase in traffic on the M5 north of Junction 21 **and increases on the A368 connecting to the A37 near Pensford**: Table 4-5 presents options to address these increases in traffic.'*

Table 4-5 suggests that impacts on the A368 will be mitigated by improvements on the A38, but it is by no means obvious how that would work. Improvements to the A38 (and its connection with the A37 in Bristol) are unlikely to divert traffic travelling towards Bath on the A368.

If a new Junction 21A on the M5 were developed, impacts on the A368 would be even greater (as a short cut from the M5 to Bath and surroundings). The JSP documents are ambiguous about M5 Junction 21A; saying that it is not a proposal of the JSP, but that it is being considered in other plans and would add to the benefits of the bypasses to Banwell and Sandford/Churchill. What is the status of proposals for M5 Junction 21A?

4. Forecast Traffic Flows:

Diagrams in the report are not sufficiently clear to show the forecast impacts of the proposed development or the mitigation measures. Will you please ensure that full information is made available by the West of England JSP and JTP teams to all interested parties on existing and forecast traffic flow figures?

This traffic flow data should be as illustrated in Figures 3-6 and 4-4 of the Transport Topic Paper 8 Update (WED007) to assist our understanding, particularly in relation to the A368 (west and east of the A38) and other local roads like Stock Lane, King Road and the B3134 Burrington Combe. The data should show all relevant scenarios, i.e. the Sandford Bypass with and without the Churchill Bypass and with/without Junction 21A at the relevant programme dates, with the related assumptions about development at those dates.