

## Disconnect with Transport and Infrastructure plan

**The JSP fails the test of soundness because it fails to provide the right amount of housing in a sustainable way, and is not achievable within the time-period.**

There is no committed Transport Plan in place at the time of JSP examination, merely a Transport **Study**. This means that if the JSP is accepted the housing becomes a reality and the Transport becomes a wish list. This means that in examining the suitability of Strategic Locations we should heavily discount the assumption of *any* significant transport or infrastructure improvement mentioned.

Some weight can be applied to the transport development assumptions for a Strategic Location where Policy 7 states specifically that particular infrastructure improvement must be a precondition to development. **However, there is great inconsistency across the four Local Authorities in terms of what infrastructure must be committed before proceeding.** For example:

- Policy 7.1 (North Keynsham): *“No housing will be completed at the North Keynsham SDL ahead of the Avon Mill Lane to A4 link, Keynsham rail station improvements and Metrobus (high quality public transport) route from Bristol to Keynsham on the A4 corridor being completed”*
- Policy 7.2 (Whitchurch): *“No dwellings will be completed at the Whitchurch SDL ahead of... the multi-modal link A4-A37-south Bristol link including as a pre-requisite, the Callington Road scheme being completed”*. In addition, the comment in the indicative trajectory states *“Trajectory assumed lead in time of 13 yrs, to allow for strategic transportation measures to be funded and programmed. Indicative build out rates: 50-300pa. Slow build out to allow new community to form.”*
- Policy 7.3 (Brislington Park): *“The provision of key transport infrastructure in advance of development including... Callington Road Link / A4 Rapid Transit Scheme, widening of the A4 strategic road network corridor to provide public transport infrastructure inbound and outbound”*
- Policy 7.5 (Banwell Garden Village): *“Development will not commence until the construction of the Banwell Bypass is delivered as part of the M5 to A38 highway improvements with connection to a new M5 Junction 21a at a location to be confirmed, and onward connection to the Sandford/Churchill Bypass”*

Contrast this with **all** of the Strategic Developments in South Gloucestershire, in each case stating merely that the development will provide or contribute towards strategic improvements which may include X, Y or Z:

- Policy 7.8 (Buckover): *“Provision of a strategic transport package including as appropriate delivery of or contributions towards.....”*
- Policy 7.9 (Charfield): *“The new development will provide or contribute to a strategic transport package including.....”*
- Policy 7.10: (Coalpit Heath): *“Provide or contribute to a strategic transport package including ....”*
- Policy 7.11: (Thornbury): *“Development will also make financial contributions towards local and strategic transportation schemes, including potentially....”*
- Policy 7.12: (Yate): *“new development areas will provide or contribute to a strategic transport package including...”*

The mitigations in South Gloucestershire are so weak as to be valueless, and furthermore all rely on contributions from the Developer that will not be forthcoming until houses are built out, which means that if any mitigation is delivered at all it will be some time after the development is deep into construction.

The transport improvements contained within the Joint Transport Study (JTS) amounts to £8.9bn. If we make a generous assumption that spend starts in September 2018 and is completed five years before the 2036 (in order to have any mitigating effect on the developments) that amounts to £1.8m per day. These are completely fanciful numbers. In these times of budget constraint there is next to no possibility that such funding would be approved, and if it was there is no chance that WEJA would be able to assimilate and manage resource to spend at such a rate.

Contrast this fantasy economics with the NPPF (para 154) which states that “*Local Plans should be aspirational but realistic*”. This reality gulf alone should make the plan unsound. However, the Government Guidelines on Local Plans (updated July 2017) addresses the question “*How can the local planning authority show that a Local Plan is capable of being delivered including provision for infrastructure?*” as follows:

- *the plan should be realistic about what can be achieved and when (including in relation to infrastructure). This means paying careful attention to .... identifying what infrastructure is required and how it can be funded and brought on stream at the appropriate time*
- *The Local Plan should make clear, for at least the first 5 years, what infrastructure is required, who is going to fund and provide it, and how it relates to the anticipated rate and phasing of development*
- *Where the deliverability of critical infrastructure is uncertain then the plan should address the consequences of this, including possible contingency arrangements and alternative strategies*
- *the key infrastructure requirements on which delivery of the plan depends should be contained in the Local Plan itself*

The NPPF goes further in para 157 stating that the Local Authority should “*plan positively for the development and infrastructure required in the area*”.

We find it astonishing that the JSP addresses literally none of these criteria.

**Q4. Please set out what modification(s) you consider necessary to make the Joint Spatial Plan legally compliant or sound, having regard to the matter you have identified at Q3 above where this relates to soundness. (Please note that any non-compliance with the duty to co-operate is incapable of modification at Examination.) You will need to say why this change will make the Joint Spatial Plan legally compliant or sound. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as precise as possible:**

Once again, we consider that the shortcomings of the JSP in relation to the Government guidelines are so significant that they cannot be remedied by a simple modification to the text. We believe the WEJA should be required to resubmit the plan, this time following Government guidelines on Local Plans with regard to transport and infrastructure setting out the following information:

1. The required infrastructure for the Spatial Plan, stating how it relates to each major Strategic Development, and how it will be funded. This should be fully phased for at least the first five years of the Plan
2. Realistic assessment of key risks, including likelihood of funding and capability for delivery. This should show what contingencies exist in the event that this infrastructure is not forthcoming

We further suggest that a new para 29 be added under Chapter 3 to say that *“For each Strategic Location the essential Transport and Infrastructure needs will be identified and tested such that at no stage during the development will significant strain on infrastructure be placed on surrounding, pre-existing towns, and that a genuine modal shift in transport can be achieved away from the private car. This necessary infrastructure and transport will be in place from the outset, and outline planning permission **will not be given** unless and until funding is secured for these improvements”*