Comment on Joint Spatial Plan - Technical Evidence Work Consultation (November 2018) from Thornbury Residents Against Poorly Planned Development (TRAPP’D)

Submitted by: Colin Gardner

Date: 18th December 2018

1. Introduction

I am instructed to respond to the Technical Evidence Work Consultation on behalf of TRAPP’D (Thornbury Residents Against Poorly Planned Development). We are an Action Group formed from residents of Thornbury who are alarmed at the impact of the speed and quantum of housing development in and around Thornbury, despite a complete lack of planning for the infrastructure needs of such a growth. We have more than 400 registered supporters.

We submitted a full response to the JSP on January 10th 2018, and will not repeat the arguments made in that document. We welcome the Inspector’s letters to the effect that further work is required on the Sustainability Appraisals (SA) and Transport Infrastructure and we are pleased to offer our response to that work here. We also very much welcome the comments in the Inspector’s initial letter that “Policies 7.1 – 7.12 set out a large number of, in some cases quite specific, requirements which are akin to that commonly seen in a local plan policy allocating a site for housing development” and in the second letter that “We infer from this .... that the Councils’ intention is now that the requirements would be definitive. Thus, they would not be a ‘starting point’ and nor would they ‘evolve’ as the Local Plans are prepared. It appears to us that the implication of this is that the Local Plans would be likely to have a relatively small role in influencing the nature and design of the SDLs”. This acknowledges the reality that Local Plans will be irrelevant when it comes to contesting the large development sites, and therefore examination of the JSP will be our only real opportunity to make our spatial case against some of the proposals in this plan. This in turn brings into focus some of the issues that might otherwise have been dealt with at the Local Plan stage. A case in point is South Gloucestershire’s statutory commitment to reducing greenhouse emissions, in respect of which it is our contention that the current spatial strategy will defeat this commitment. We therefore comment on this directly in section 3, linked to the claim in the SA that the Buckover proposal earns a “+” in the category “reducing greenhouse emissions”.

2. The additional forecasts cited are specious and inserted to misdirect the Examination in Public

Para 1.2 of the Consolidated Sustainability Appraisal (CSA) states that the purpose of the report is to respond to points raised by the Inspectors, broadly being a request to produce further work on the comparative sustainability of the sites selected for development versus those that are not. Para 1.5 then goes on to introduces what is referred to as “three reasonable alternatives for the quantum of housing”, all of which are higher than the scenario used in the JSP, with much of the ensuing report then given over to examining how this additional demand could be satisfied if such higher forecasts would be used instead.

We note that this additional work is uninvited, and no explanation is given as to why it has been incorporated. However, it is not hard to understand its real purpose; this is a piece of misdirection
designed to create the specious impression that if “reasonable alternative” forecasts are all higher than the central forecast used, then we must dispel all doubt that the forecast is overstated, and by inference not look too closely at whether the SA work shows that an alternative spatial strategy might not be more sound.

However, we find it very helpful that the West of England Combined Authorities (WECA) recognise that latest ONS forecast of housing need (published 20th September 2018) is a reasonable alternative, and we would therefore like to explore that a bit further in comparison with the original forecast used in the JSP. The original Objectively Assessed Need (OAN) was derived from the 2014 based forecast of housing need by the Department for Communities and Local Govt (DCLG), together with a “market signals” adjustment (15% for BANES and 10% for others). The first of the “reasonable alternative forecasts” of “approximately 110,000” is derived from the new ONS forecast applied to the new Standard Methodology published alongside the revised NPPF, as illustrated below:

<table>
<thead>
<tr>
<th></th>
<th>2016</th>
<th>2036</th>
<th>Incr</th>
<th>Market Adj</th>
<th>Derived OAN</th>
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<tbody>
<tr>
<td><strong>DCLG used in JSP</strong></td>
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<td>Bath and North East Somerset UA</td>
<td>76.3</td>
<td>85.6</td>
<td>9.3</td>
<td>15%</td>
<td>1.4</td>
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<tr>
<td>Bristol, City of UA</td>
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<td>37.5</td>
<td>10%</td>
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</tr>
<tr>
<td>North Somerset UA</td>
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<td>112.7</td>
<td>19.6</td>
<td>10%</td>
<td>2.0</td>
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<tr>
<td>South Gloucestershire UA</td>
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<td>136.4</td>
<td>21.8</td>
<td>10%</td>
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<tr>
<td><strong>WECA</strong></td>
<td>476.6</td>
<td>564.7</td>
<td>88.2</td>
<td>10%</td>
<td>9.3</td>
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<table>
<thead>
<tr>
<th></th>
<th>2016</th>
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<th>Incr</th>
<th>Market Adj</th>
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<tr>
<td><strong>ONS (Sept 20th 2018)</strong></td>
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<tr>
<td>Bath and North East Somerset UA</td>
<td>76.1</td>
<td>86.4</td>
<td>10.3</td>
<td>11.10</td>
<td>1.444</td>
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<tr>
<td>Bristol, City of UA</td>
<td>190.1</td>
<td>222.8</td>
<td>32.7</td>
<td>8.99</td>
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<tr>
<td>North Somerset UA</td>
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<td>18.3</td>
<td>8.99</td>
<td>1.312</td>
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<tr>
<td>South Gloucestershire UA</td>
<td>113.5</td>
<td>135.7</td>
<td>22.2</td>
<td>7.97</td>
<td>1.248</td>
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<tr>
<td><strong>WECA</strong></td>
<td>472.4</td>
<td>555.9</td>
<td>83.4</td>
<td>109.4</td>
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</tbody>
</table>

* workplace based median house price to earnings ratios - ONS Mar’ 2017 (table 5c) - published 26 April 2018

The first thing to note here is that the forecast itself shows a reduction of the housing need of 8,900 houses by 2036, and the movement is a 5.4% reduction from 88,200 to 83,400.

It is only the new Affordability Factors, as published in the new NPPF, that boosts the forecast to the figure close to 110,000, as referred to in the CSA. We believe that the use of Affordability Factors to apply an average uplift of 31% over an entire 20-year planning horizon is unsound and, assuming the forecast need is correct, will simply result in developers reducing the build-out rate in order to preserve the value of land on their balance sheets, and to maintain a land supply below years to preserve the ‘tilted balance’ in planning appeals. We also maintain that the principle behind the use of these affordability factors is fundamentally flawed, as demonstrated in the presentation below by CPRE:
Moreover, our understanding is that the JSP should be evaluated against the old NPPF, not the 2018 version, so it cannot be correct to apply the new “standard methodology” affordability factors in the new NPPF. It therefore be clear that **the direction of the official forecast of the housing need growth is downwards.**

The final two forecasts are submitted by Developers who very obviously have a vested interest in seeking to boost the requirement. In contrast, many representors submitted logical arguments stating the case for a lower forecast, including TRAPP’D. If WECA was concerned to be genuinely helpful to the inquiry, they would have shown their preferred spatial scenarios against a balanced range of representor submissions, both higher and lower than the JSP forecast. A balanced approach such as this would have the great advantage of identifying which developments are considered by WECA to be the most marginal.

Finally, on this topic, our view is that it is self-evident that there can be no such thing as a “correct” forecast before the fact – the best anyone can do is use the latest available evidence and then plan for contingencies. The building industry would like to suggest that there is no such thing as planning for too many houses, but this is simply not true. Once the JSP forecast is accepted it becomes a rigid commitment to build out at least that number of houses until 2036. However, if this turns out to be an over-estimate the impact is catastrophic from a spatial planning point of view; the relevant Local Authority will find that sites granted planning permission fail to release houses at the planned rate, and for the duration of this plan will be punished for failing to achieve a five-year land supply by applying the “tilted balance” whereby, for all intents and purposes, its planning policies (including spatial policies) will be set aside in a futile attempt to catch up with over-estimated demand.

We don’t need to guess what this may look like, we can see it today in places like Thornbury. This town is one of the Strategic Development Locations (SDLs) with 500 houses assigned (on top of some 1,100 granted permission over the previous five years). This is supposed to take us up to 2036, but in fact planning permission has already been granted for sites amounting to circa 500 houses, which means that residents have no meaningful mechanism through this Examination in Public (EiP) to argue that Thornbury should not be classified as an SDL in the JSP.

As if this democratic deficit was not bad enough, in the last year or so developers have submitted proposals for new housing (in the ‘call for sites’) that now surrounds our town, totalling approximately 3,400 houses. That means we face up to a staggering 700% of the proposed development in the JSP, with another 17 years still to go! The Inspectors will note that table 4.1 of the SA shows that in no scenario of higher housing demand does the preferred spatial strategy suggest that the quantum of development in Thornbury should increase beyond the 500 houses proposed. Yet this is precisely where the additional housing will come first if the LA is unable to demonstrate a five-year land supply, which in turn would be the result of an over estimate in the level of demand and rate of housebuilding.

This clearly demonstrates the planning chaos that befalls a LA if an overestimated forecast is allowed to stand in the JSP. In this scenario - under the NPPF - housing will be built first and exclusively where it is most profitable to do so, not where the spatial plan and supporting infrastructure intends. It is therefore imperative during the EiP that the planning harm an over-forecast can do is
recognised, and that the inquiry is not lulled into a false premise that it is safer to ‘err on the high side’.

3. **The Sustainability Appraisal for Buckover does not stand scrutiny in comparison with sites rejected and is logically incoherent**

The Inspectors third letter (1st August) warns that “*in respect of the SA work we would again emphasise that it is important that the Councils consider whether there are any, as yet untested, reasonable alternatives*”. We note that the CSA report incorporates no new work on sustainability of either the SDLs or the alternatives, as far as we can tell, but instead pulls together a summary of the work previously conducted. There is no sign here that WECA has anything other than a closed mind to its stated strategy, and there is most certainly no evidence of consideration of any previously untested ‘reasonable alternative’.

However, the CSA report raises some very useful points about the alternatives considered during the development of the JSP, and provides a comparison of the scores for those sites selected versus those rejected, which underlines our contention that the selection process was based on anything but an objective analysis of sustainability. It can be seen from the CSA and its appendices that over time during the JSP process the SA scores for a number of sites have changed; those sites that have not been selected have been downgraded whilst those selected to be SDLs have been upgraded. However, for comparative purposes the most useful data is contained in table 4.11 of the CSA, showing the scores for all sites at the point they were honed down to the 12 SDLs.

We have focussed on Buckover, comparing it to two sites that have been suggested as better alternatives, namely “north of M4/M5” and Ashton Vale. Based on the scores given at the time for all three sites it is impossible to see how an objective analysis could have preferred Buckover to these two alternatives:
Here we see that against Ashton Vale, Buckover is considered worse in nine out of 21 categories, and better in only one (minimising tidal/alluvial flooding). Against M4/M5 Buckover is worse in six categories and better in three.

We believe that this further demonstrates that the selection of SDLs (or perhaps the discarding of potential SDLs) is not based on an objective assessment against sustainability criteria, but on the basis of political or other subjective preference.

Turning now to CSA Table 5.3 (page 116) which shows the publication version of the SA we draw the Inspector’s attention to the fact that the sustainability scores have been upgraded in seven categories for Buckover at this final stage of the JSP process:
In particular, we are incensed by the suggestion that Buckover earns a “++” rating for “access to sustainable transport” as the fundamental weakness of this development is that it straddles the busy A38 and will be almost exclusively based around the private car. For this reason also, we think it is completely fallacious to argue that this development will contribute to reducing greenhouse emissions. Our view is that this analysis shows that WEJA fails the test of logic against criteria set and demonstrates the influence of ‘window dressing’ to support cherished projects.

Some insight into how this ratings inflation is achieved comes from a comparison of the SA commentary at the Emerging Spatial Strategy stage versus the publication version, summarised in Appendix 1.

We draw attention to the following points from this summary:

- At the Emerging Spatial Strategy stage the phrase “car-based modes currently dominate, with high levels of out-commuting to access facilities in other areas” was repeated in many categories, whereas in the Publication Version this phrase has now been conveniently dropped. We assume that WECA feels able to do this because of the inclusion of a policy requiring a “strategic transport package”, which is presumably also the justification for a “++” score on “access to sustainable transport”. However, as we will show in section 4, the Transport Assessment paper shows that the transport package fails to create any modal shift from car-base transport - this site remains fundamentally car-based.
• Policy 1b, minimise impacts on air quality, is scored as a “+/?”, and yet the comment remains that there is “potential for areas of poor quality along the A38 and near to the M5”. Under mitigations it goes on to say that “consideration will be required to ensure the A38 can continue to act as an effective relief road to the M5 without detriment to the new resident’s health & wellbeing”. We draw the inquiry’s attention to the fact that there is a great deal of concern from current residents about the potential traffic impact on the A38, poor air quality being one the concerns. We therefore fail to understand how the first statement can be consistent with a positive sustainability score and we point out that the health concerns do not just relate to “new resident’s health and wellbeing” but also those that currently live alongside this road in places like Falfield and Buckover. We will return to the question about the A38 as a relief road in section 4 below.

• On policy 1c, access to healthcare, latterly upgraded to a “+/?” score, the comments say that GP facilities etc are outside of reasonable distance, as is any hospital facility. The mitigation says that policy 7.8 “has no specific action”. We therefore fail to see how this can be a positive score, or what justification prompted an improvement from a “-” to a “+/?”.

• Policy 2d concerns educational facilities, and this also has been upgraded from “-” to “+”, presumably on the strength of the fact that policy 7.8 includes the provision of new school facilities. Our concern on this point is twofold; firstly, whether the funding for such facilities has already been secured (and if not, how can such a rating be justified?), and secondly our contention that any such large greenfield site is bound to require new facilities such as schools, and therefore adopting such a policy should not be represented as a positive differentiator in the SA.

• Finally, we return to the subject of environmental sustainability under policy 5b, upgraded to a “+” in the SA. Our contention is that a deliberately blinkered approach has been taken here to examine only the low carbon design features (which, by the way, every large greenfield development always claims), ignoring the comment about the “general issue of dispersed growth producing longer vehicle trips”. This latter point refers to a fundamental flaw in both this proposal and the SA. We have already seen that this is development enabled almost exclusively by the private car, located a long distance from major centres of employment, and thereby this spatial strategy will inevitably contribute to a significant addition in CO2 emissions. South Gloucestershire Council has a statutory obligation to meet specified CO2 reduction commitments which it will fail to meet if it pursues the proposed spatial strategy.

The South Gloucestershire Annual Monitoring Report (AMR) specifies a 35% CO2 reduction target by 2020 (from a 1990 base) and a 50% reduction by 2025 and 80% by 2050. The 2017 AMR also shows progress to 2015 towards meeting that target:
This shows a steady improvement in CO2 levels from Industry and Commerce and from domestic sources, but a flat performance from transport. This means that transport is becoming increasingly important in the mix:

If we simply project forward current trends to 2025, we will see Transport based emissions approaching 50% of the total CO2 generated:
Therefore, without tackling a reduction in CO2 from transport it can be demonstrated that it will be impossible to meet the specified overall target reductions. Returning to those targets, a 35% reduction by 2020 would mean reducing the overall levels of CO2 to 816kt, and if transport remained flat (despite rising population) then the non-transport elements would have to deliver a 52% reduction. Extending that argument to 2025 and 2050 for the respective targets in those years would require impossible reductions in non-transport levels of CO2 of 74% and 118% respectively:

Assuming a flat performance in transport based CO2

<table>
<thead>
<tr>
<th></th>
<th>Target reduction</th>
<th>Implied total CO2</th>
<th>Implied emissions from non transport</th>
<th>Reduction in non transport CO2</th>
</tr>
</thead>
<tbody>
<tr>
<td>2015</td>
<td></td>
<td>1255</td>
<td></td>
<td></td>
</tr>
<tr>
<td>2020</td>
<td>35%</td>
<td>816</td>
<td>413</td>
<td>52%</td>
</tr>
<tr>
<td>2025</td>
<td>50%</td>
<td>628</td>
<td>225</td>
<td>74%</td>
</tr>
<tr>
<td>2050</td>
<td>80%</td>
<td>251</td>
<td>-152</td>
<td>118%</td>
</tr>
</tbody>
</table>

What this analysis demonstrates is that South Gloucestershire has a duty to reduce transport-based CO2 emissions, which will be a major challenge given the projected increase in population. However, in promoting developments such as Buckover it is setting out a spatial strategy that creates a separation between where people live and where they will work, supported almost exclusively by the private car. It therefore seems obvious to us that this spatial strategy will cause the Council to fail in this respect.

It is therefore our assertion that South Gloucestershire is deliberately or recklessly proposing a spatial strategy that will illegally breach target CO2 reductions, and on these grounds alone the plan is unsound. We have not found any analysis in the JSP or associated documents whereby this problem is numerately dealt with, and we believe that this also makes the plan unsound.
4. Emerging Findings Transport report reveals huge downgrade from previous assumptions and are wholly inadequate to mitigate the adverse impact of the proposed spatial strategy

The Joint Transport Study (JTS) is supposed to be the definitive piece of infrastructure work to partner the JSP. It remains in draft form with costings quoted as being “at least £8.9billion in future outturn prices”, of which some £6billion has no funding source identified. It is and remains to us a completely fanciful wish list with no grounding in reality, despite being hitherto the only supporting document to guide the necessary infrastructure to deliver the JSP.

However, at the Inspector’s request we now have the Emerging Findings Transport Report (EFT) and the Transport Topic Paper (TTP). The EFT does not explicitly summarise the overall costings of its findings, but a quick totalling of the recommendations shows an amount of between £1.1bn and £1.3bn over 15 regional transport corridors. This raises the very obvious question: what about the remaining £7.6bn to £7.8bn? Was this all unnecessary froth, or will the package in the EFT be inadequate to support the housing development?

The second obvious question is that if the JTS has only one third of its wish list with a funding source identified (note: source identified does not equal funding approved), what proportion of the EFT is underpinned by funding approval?

To support three out of the twelve of the SDLs – actually, the three that are on the outer circle from the hub in Bristol – the EFT has transport investments proposed at £79m (table 7.3) plus a station at Charfield costed at £14m to £20m (table 8.3). That represents just 7% to 8% of the total in the EFT, or 1% of the JTS.

That investment is dominated by improvements to the M5 J14 at £59m. This is the junction that famously had traffic lights installed at its entrances and exits, only to discover that this caused dangerous queues at rush hour, and therefore had to be switched off at these times. We now have the dubious honour of having part time signals switched off at peak times but on in the middle of the night! Our confidence in Highway planning is therefore justifiably at a low ebb.

More seriously, though, the flagship policy often raised as the solution to congestion on the sclerotic A38 is the Metrobus. However, we are highly sceptical that this new route will ever be approved or will be feasible from an engineering perspective given the widening of the A38 that we understand would be necessary. We do not believe that this and other developments listed will be given as a precondition to these significant housing developments, and we are extremely concerned that the spatial strategy will be approved upon a transport and infrastructure promise that will never be fulfilled.

Moreover, we do not believe that these developments will be enough to achieve a modal shift away from the private motor vehicle. Existing bus services from Thornbury to Bristol regularly run empty because it simply takes too long, and we are not convinced that MetroBus, should it ever be extended to Thornbury, would be sufficiently quicker.

The assumption of very little modal switch is entirely supported by the TTP. Para 3.3.4 (page 20) states that prior to the transport intervention “These SDLs will generate concentrated travel demands, which will require sustainable travel choices and effective mitigation of the impacts on the road network”. More specifically for Buckover and Thornbury on page 28 it states that “Traffic to/from Buckover and Thornbury would be more reliant on the A38, south towards Junction 16, from where traffic would continue towards the North Fringe, Bristol and other destinations, and also north towards Junction 14 of the M5”, and then on page 29 goes on to say that “increases in traffic delays
are forecast to occur in the following locations …. On the A38 southbound between Thornbury and M5 Junction 16 due to additional trips generated by new housing at Thornbury and Buckover; At M5 Junction 14, including the approaches from the B4509 due to traffic from Charfield and Buckover SDLs, and on the M5 southbound between Junctions 14 and 15”. This is illustrated graphically in figure 3.7:

![Figure 3.7 – Forecast traffic flow differences in northern area (AM Peak Hour)](image)

The green lines above show the increase in traffic (PCU = passenger Car Units) caused by the Strategic Development Locations. Key point to note here is that the increase in traffic on the A38 is between 300 and 600 PCUs.

On page 40 the TTP also summarises generically the situation driven by the JSP before any transport mitigation as follows (our emphasis) “This represents a significant deterioration in network performance, which is substantially greater than the reduction in network performance forecast between 2013 and 2036 without the JSP. Such unmitigated traffic growth would therefore have unacceptable economic, environmental and social impacts.”

The report then goes on to describe the mitigating influence of the transport packages described and reproduces the table above for each area after mitigation (e.g. figure 4.5 for the area north of Bristol). We have shown below a ‘before’ and ‘after’ version side by side, and focussed on the A38, which is our main area of concern:
It should be noted that there is no discernible difference to the increased level of traffic on the A38 with and without the transport mitigation. In other words, regardless of the transport package, this spatial strategy would bring about an unacceptable economic, environmental and social impacts, with car-based modes still dominant. At this point we refer back to the SA that showed Buckover as:

- “++” on access to sustainable transport
- “+” on reducing greenhouse emissions
- “+/?” on minimising air quality impacts

Finally, we said earlier that we would return to the point on policy 1b in the SA commentary which stated that “consideration will be required to ensure the A38 can continue to act as an effective relief road to the M5”. This revolves around a highly controversial aspect of the proposal, namely the fact that the A38, which bisects the centre of the Buckover proposal, is the designated relief road for the M5. This means that the A38 becomes exceptionally busy when there is a problem on the M5, which can cause near standstill whether from heavy traffic on a bank holiday weekend to a full-blown diversion when the motorway is closed. In our main response to the JSP we had included a Freedom of Information (FOI) memo from a Transport Planning Officer to the effect that the problems of the A38 may have to be “fudged” if the Council wished to pursue this case; in October 2017 we submitted a second FOI to delve further into the question of the problems of the A38 in connection with Buckover and Appendix Two contains an extract from this FOI. This is a memo from South Gloucestershire’s Head of Transport and Strategic Projects quite rightly expressing disappointment at the apparent insistence by the developer not to divert the A38, but instead to insert traffic calming measures that would clearly greatly exacerbate the problems of this road.

It would therefore seem by July 2017 WECA already knew that the very weak words in the mitigation in the SA that “consideration” would be required to ensure the A38 can continue to act as the relief for the M5 would amount to nothing, and that no action whatsoever will be taken to prevent this from becoming a major problem area.
5. Conclusion

In the Inspectors third letter (1st August) we appreciate the comment that further analysis should be “carried out with an “open mind” and ... not seek to simply justify the approach/policies currently set out in the draft plan”. We are left wondering if WECA either missed this sentence, or simply did not think that these words were intended as an instruction for them to follow, as the additional work has been carried out in precisely the manner that WECA has been asked to avoid. In our view the reason for this failure runs deep in WECA’s psyche; in our experience their attitude is that their strategy is the one they are going to follow, with consultation therefore being a process during which alternatives must be duly rejected. This reasoning is so ingrained into WECA’s thinking that it would not have occurred to them to do anything other than defend their strategy with as much volume of evidence as they can muster. In a way we are pleased that this will have demonstrated more clearly than we could ever have explained just how the process of consultation has so far been conducted.

The green space around Thornbury is under greater threat than ever before, and the town itself is liable to be consumed by a level of unplanned development on a scale that, ironically, dwarfs the level intended in the JSP. This threat will quickly become a reality if an overly ambitious forecast is yet again adopted, enabling developers to easily manage the build out rate to ensure that the LA does not have a five-year land supply, and thereby set aside all sensible planning rules. We ask that the Inquiry should heed the direction of travel of what both official and independent forecasters are actually saying will be the housing need for the region, rather than to bend to political pressure and vested interests to over-forecast.

In terms of the spatial strategy itself it should be clear that this has not been driven by the Sustainability Analysis, which does not stand scrutiny either in isolation, or in comparison with sites not preferred for some other reason – probably political. Furthermore, in respect of Buckover at least, WECA’s tactic is to either downplay the problems, or make warm noises that solutions will surely be found at a later stage – if only the spatial strategy could just be ticked off first. However, a dig into the detail of the additional analysis requested by the Inspectors shows that in the case of the A38 the mitigating transport actions will not even register. Not only will this mean that current and future residents will bear the adverse consequences of delays and poor air quality, but the strategy itself of creating a large separation of where people work and where they live – in a location where that separation is only realistically going to be bridged by the private car – is so flawed that it will cause the Council’s own commitment to greenhouse gas emission targets to be breached.

Our contention is that this JSP is unsound, and we hope to have the opportunity to present our reasons to the Examination in Public.
## Appendix 1: Comparison of the Sustainability Analysis comments on Buckover at the time of the Emerging Strategy (November 2016) with the JSP publication version (2018)

(Our highlights and shading)

<table>
<thead>
<tr>
<th>Emerging Spatial Strategy – Nov 2016</th>
<th>Publication version - 2018</th>
<th>Mitigation or Enhancement</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>1b. Minimise impacts on air quality and locate sensitive development away from areas of poor air quality</strong></td>
<td>There is currently no AQMA in the area. Potential for areas of poor air quality along the A38 and near to M5.</td>
<td>There is no AQMA in the area. Potential for areas of poor air quality along the A38 and near to M5.</td>
</tr>
<tr>
<td><strong>1c. Achieve reasonable access to healthcare facilities</strong></td>
<td>There are no health care facilities in Buckover. The nearest GP practice, dental practice and pharmacy are located in Thornbury, outside of reasonable distance. As a result, car-based modes currently dominate, with high levels of out-commuting to access facilities in other areas.</td>
<td>There are no healthcare facilities in Buckover. The nearest GP practice, dental practice and pharmacy are located in Thornbury, outside of reasonable distance. The nearest hospital is outside of reasonable distance.</td>
</tr>
<tr>
<td><strong>2c. Achieve reasonable access to community facilities</strong></td>
<td>There are no dedicated community centres, post offices or libraries in the area or within reasonable distance. As a result, car-based modes currently dominate, with high levels of out-commuting to access facilities in other areas.</td>
<td>There are no dedicated community centres, post offices or libraries in the area or within reasonable distance.</td>
</tr>
<tr>
<td><strong>2d. Achieve reasonable access to educational facilities</strong></td>
<td>There are no schools in Buckover. The nearest primary and secondary school provision is within Thornbury, outside of reasonable distance.</td>
<td>There are no schools in Buckover. The nearest primary and secondary school provision is within Thornbury, outside of reasonable distance.</td>
</tr>
<tr>
<td><strong>2e. Achieve reasonable access to town centre services and facilities</strong></td>
<td>Buckover is outside of reasonable distance to Bristol city centre. The nearest town centre is Thornbury, outside of reasonable distance. There are no local shops located within Buckover. As a result, car-based modes currently dominate, with high levels of out-commuting to access facilities in other areas.</td>
<td>Buckover is outside of reasonable distance to Bristol city centre. The nearest town centre is Thornbury, outside of reasonable distance. There are no local shops located within Buckover.</td>
</tr>
<tr>
<td><strong>3a. Achieve reasonable access to sustainable transportation</strong></td>
<td>Limited access to bus-based public transport network at present. There is at present no nearby access to the rail network.</td>
<td>Limited access to bus-based public transport network at present. There is at present no nearby access to the rail network.</td>
</tr>
<tr>
<td>Pedestrian connections to Thornbury and other local highway network improvements as necessary</td>
<td>All development will need to adhere to national and each council’s planning policies related to energy provisions. However, there is no evidence at present that development can link into existing heat networks. No locally specific issues. General issue of dispersed growth producing longer vehicle trips.</td>
<td>Policy 7.8 requires the embedding of zero-carbon and energy positive solutions throughout the planning, design and delivery process across the whole settlement. Large scale development provides an opportunity to incorporate larger scale low carbon scheme which potentially allows higher standards to be achieve.</td>
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<td>5b. Reduce non-renewable energy consumption and ‘greenhouse’ emissions, and provide opportunities to link into existing heat networks</td>
<td>All development will need to adhere to national and each council’s planning policies related to energy provisions. However, there is no evidence at present that development can link into existing heat networks. No locally specific issues. General issue of dispersed growth producing longer vehicle trips.</td>
<td></td>
</tr>
</tbody>
</table>
Appendix 2: FOI Memorandum from South Gloucestershire’s Head of Planning and Strategic Projects

(Our emphasis)

From: Emma Blackham
Sent: 11 July 2017 09:34
To: Brian Glasson <Brian.Glasson@southglos.gov.uk>; Patrick Conroy <Patrick.Conroy@southglos.gov.uk>
Cc: Helen Young <Helen.Young@southglos.gov.uk>
Subject: RE: JSP Policy 7

Thanks for sharing Brian.

We will have comments on the transport sections and I will ask Helen to review.

Initial thoughts:

- A decision appears to have been made re: reducing speeds on the A38 and adding crossing points through the Buckover development. I think we should be pushing the Buckover development to investigate further moving the A38 so that it doesn’t cut through the centre of the development. Certainly I am loath to see us miss this opportunity missed by setting in policy the approach as at present.

Helen will get back with any additional comments.

Thanks

Emma